

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

CYNTHIA B. SCOTT, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	Case No. 3:12-cv-00036-NKM
v.)	Sr. Judge Norman K. Moon
)	
HAROLD W. CLARKE, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
_____)	

DECLARATION OF THEODORE A. HOWARD

Theodore A. Howard, of the age of majority, hereby declares as follows:

1. I am a member, in good standing and on active status, of the District of Columbia Bar and a partner in the Washington, D.C. law firm of Wiley Rein LLP.
2. I submit this Declaration in support of Plaintiffs' Petition for Award of Enforcement Phase Attorneys' Fees and Costs and supporting Memorandum of Law. Except to the extent otherwise expressly indicated, I have personal knowledge of the matters set forth in this Declaration and, if called upon, believe I would be found competent to testify hereto.
3. In seeking an award of attorneys' fees in the circumstances of a case of this kind, a required element of the applicant's proof involves demonstration to the satisfaction of the Court that the hourly rate charged by the applicant's counsel for which recovery is sought is reasonable in light of counsel's experience, skill and reputation. *See generally Blum v. Stenson*, 465 U.S. 886, 95 n.11 (1984).
4. I graduated from Harvard Law School in 1981 and have been engaged consistently since then in the private practice of law in Washington, DC, concentrating principally on involvement in complex civil litigation matters in federal and state courts, locally

and on a national basis. In addition to my membership in the District of Columbia Bar, I have been admitted to practice before the Supreme Court of the United States, the United States Courts of Appeals for the Fourth, Fifth, Eighth, Ninth, Eleventh and District of Columbia Circuits, the United States Court of Federal Claims and the United States District Court for the District of Columbia.

5. From 1986 through 2014, the principal focus of my practice involved the counseling and representation of international and domestic property/casualty and professional liability insurance companies with respect to complex insurance coverage disputes and related litigation matters. I served as Co-Chair of the American Bar Association, Section of Litigation, Insurance Coverage Litigation Committee (ICLC)'s annual continuing Legal Education Conference, served as one of the Managing Editors of the ICLC's award-winning journal, *Coverage*, and was the Co-Author of a leading two-volume treatise, *The Practitioner's Guide to Litigating Insurance Coverage Actions* (Aspen/Wolters Kluwer Law & Bus. Publications, 2d. ed.). My competency as an insurance practitioner was recognized (at various times) by my inclusion in "Best Lawyers in America," "America's Leading Lawyers for Business" (Chambers Publications), "D.C. Superlawyers" (Law & Politics Publications), and *The International Who's Who in Insurance and Reinsurance*, and I was a Fellow in the American College of Coverage and Extracontractual Counsel.

6. Beginning in 1989, and on a nearly continuous basis since then, a significant part of my legal practice has involved the pro bono representation of incarcerated individuals seeking to challenge the constitutionality of various conditions of confinement through actions brought in the federal courts pursuant to 42 U.S.C. § 1983. In addition to this hands-on-litigation involvement, I served on the Board of Directors of a non-profit legal services organization, the

D.C. Prisoners Legal Services Project, Inc., from 1992 to 2006, including as Chair of that Board from 1995 to 2006. The Prisoners' Project devoted its activities exclusively to public policy advocacy and impact litigation aimed at improving conditions of confinement for individuals incarcerated for conduct in violation of the District of Columbia and/or United States Criminal Codes. Since 2006, following the merger of the DC. Prisoners' Project with the Washington Lawyers' Committee for Civil Rights and Urban Affairs (WLC), I have served on the Board of Directors of the WLC, including a three-year term as Co-Chair of the WLC's Board from 2011 to 2014. As a result of these activities, I believe that I have experience and expertise with respect to pro bono civil rights litigation on behalf of prisoners that compares favorably with that of any other full-time private sector attorney in the District of Columbia, if not nationally.

7. In 2014, the Management Committee of my law firm, Wiley Rein LLP, determined to create a position within the firm for a full-time pro bono practitioner and, at its request, I accepted an appointment to serve in this role. Since the completion of a period of approximately six months following my appointment during which I disengaged from all of my responsibilities for paying client matters in the firm's Insurance Practice, I have devoted all of my time to overseeing and administering the firm's pro bono program, developing and fostering the firm's relationships with the legal services organizations which refer pro bono matters to the firm's lawyers, and maintaining an active docket of pro bono cases ranging from representation of indigent or low-income individuals in the Landlord-Tenant Branch of the D.C. Superior Court to involvement in impact-oriented civil rights litigation such as the instant case.

8. I was recently re-elected to a second three-year term on the Board of Governors of the District of Columbia Bar. I have served, since 2016, on the District of Columbia Circuit Judicial Conference's Standing Committee on Pro Bono Legal Services, a position to which I

was appointed by that Court's Chief Judge, the Hon. Merrick Garland. I have also served, since 2015, on the America Bar Association's Standing Committee on Legal Aid and Indigent Defendants (SCLAID), and was recently reappointed to serve as the Chair of SCLAID for a second one-year term.

9. From the time of Wiley Rein's initial involvement in the instant case in 2008 through February 2016, when this Court issued its Final Judgment Order approving the Parties' Settlement Agreement, I was only one of a team of attorneys at the firm who participated, with our co-counsel at the WLC and the Legal Aid Justice Center (LAJC) in representing the Plaintiffs in the case. However, after the entry of Judgment, the Wiley Rein litigation team dispersed, and I have been the firm's only lawyer having a consistent and significant level of participation in the case thereafter, including the Enforcement Phase, for which Plaintiffs now seek to recover fees.

10. As indicated by the firm's Detailed Billing Record maintained by its Accounting Department for this case, a true and correct copy of which is attached hereto as Exhibit 1, reflecting time charges recorded and expenses incurred for the Enforcement Phase time period chosen by the Plaintiffs for purposes of their Petition commencing January 10, 2017, my standard hourly billable rate for legal services was/is \$775.00 per hour. The reasonableness of this hourly rate within the context of the Washington, DC legal market for practitioners of comparable experience can be measured by reference to the current iterations of the Adjusted *Laffey* Matrix and the U.S. Attorney's Office for the District of Columbia Civil Division's Adjusted Matrix, true and correct copies of which are attached hereto as Exhibits 2 and 3, respectively. Each of these Matrices has been accepted by the federal courts of the District of Columbia as competent evidence admissible for purposes of establishing the prevailing hourly

market rates for Washington, DC attorneys engaged in complex civil litigation practice. *See, e.g., Covington v. District of Columbia*, 839 F. Supp. 894, 900 (D.D.C. 1993), *aff'd*, 57 F.3d 1101, 1109-10 (D.C. Cir. 1995), *cert. denied*, 516 U.S. 1115 (1996).

11. The Adjusted *Laffey* Matrix and the U.S. Attorney's Office Adjusted Matrix establish a range of presumptively-reasonable hourly rates for practitioners of my level of experience (*i.e.*, more than 20 years of experience) in the time period January 10, 2017 to the present from a low figure of \$602.00/hr. (USAO Adj. Mat., 31+ years, 2017-18) to a high of \$894.00/hr. (Adj. *Laffey* Mat., 20+ years, 6/1/18 – 5/31/19). My hourly rate of \$775.00/hr. during the relevant time period falls squarely within the middle of this range and thus would be perceived by District of Columbia courts to be presumptively reasonable.¹ However, given the applicable cap on hourly rates imposed by the PLRA – *see* Plaintiffs' Memorandum at 13-14 – my hours for which Plaintiffs' Petition seeks recovery are subject to a rate of \$220.50.

12. During the Enforcement Phase of this litigation, I devoted substantial hours to representation of the Plaintiffs' interests through my involvement in a variety of activities including:

- serving as the principal draftsman of Plaintiffs' April 20, 2017 Notice Letter to Defendants pursuant to Section IV.2.c. of the Settlement Agreement;
- serving as the principal draftsman of Plaintiffs' Motion for Order to Show Cause Why Defendants Should Not Be Held in Contempt and supporting Memorandum of Law, as well as Plaintiffs' Reply Memorandum in response to the Defendants' Opposition to the Show Cause Motion;
- conferring and collaborating with co-counsel at the LAJC with respect to all aspects of the Plaintiffs planning and execution of their discovery strategy and trial strategy;

¹ In awarding fees to the Plaintiffs for successful prosecution of a motion to compel discovery in the pre-settlement stage of this litigation, this Court rejected the Plaintiffs' "plausible arguments why Washington, D.C. could be used as the relevant market to establish reasonable rates for counsel's services," but held that "[g]iven Mr. Howard's experience and qualifications, he is entitled to at least \$400.00 per hour for his services in [the Western District of Virginia] legal community." *See* ECF Dkt. No. 109 at 9-10 (April 15, 2014).

- participating actively in the performance of all tasks relating to pursuit of Plaintiffs' discovery of Defendants and responding to Defendants' discovery of Plaintiffs, including preparation for and conducting of depositions; meet-and-confer correspondence and telephone conferences with Defendants' counsel in an effort to narrow or resolve disputes; briefing and presentation of argument on disputed matters;
- serving as the principal draftsman of Plaintiffs' Pre-Trial Brief;
- assuming principal responsibility for working with Plaintiffs' expert, Dr. Greifinger, in preparation of his Reports, preparing him for and defending his deposition, and preparing him for and presenting his testimony at trial;
- serving as Plaintiffs' co-lead counsel at Mediation as well as at trial;
- serving as principal draftsman of Plaintiffs' Proposed Conclusions of Law, Post-Trial Brief and Post-Trial Response Brief while actively assisting LAJC co-counsel in the preparation of Plaintiffs' Proposed Findings of Fact; and
- working collaboratively with LAJC co-counsel to provide Plaintiffs' extensive written comments on each draft Report prepared and circulated by Dr. Scharff after each of his monitoring visits at FCCW prior to trial.

13. In total, my hours incurred during the Enforcement Phase on work encompassing the various activities described above, totaled 1154.00.² In the exercise of professional billing judgment of the same sort I would routinely apply in reviewing and editing a bill for submission to one of the firm's paying clients, I have reduced the total hours for which recovery is sought by 161.00 hours, to 993.00, taking into account such considerations as, for example, time devoted to specific issues that Plaintiffs' ultimately chose not to pursue at trial; time devoted to tasks more properly characterized as administrative or clerical in nature; instances in which the time description was inaccurate or insufficiently precise; instances in which the time entry could be subject to challenge as reflecting so-called "block billing," and the like.

² While the Wiley Rein LLP DBR, Exh. 1 hereto, reflects a total of 1,190 hours of my time over the period January 10, 2017 through May 31, 2019, hours associated with time entries for the activities described above totaled 1,154.

14. In addition to my hours, Plaintiffs seek recovery for the hours devoted to their representation in the Enforcement Phase of this case by four additional individuals at Wiley Rein – Legal Assistants Hannah Lynn, Rachel Williams and Elizabeth White, and Litigation Practice Support Specialist Paul Michel – for the assistance they provided to me and to Plaintiffs’ litigation team as a whole. Mr. Michel created and managed the electronic database containing all of the documents produced by the Defendants in response to the Plaintiffs’ discovery requests as well as the medical and institutional records of the Plaintiffs whose Declarations were filed in support of the Show Cause Motion. He provided training to LAJC co-counsel on how to access and utilize the databases remotely and worked in collaboration with Ms. Lynn and Ms. Williams to perform searches of the databases for particular documents needed to respond to Defendants’ discovery requests to Plaintiffs, to assist Plaintiffs’ counsel in preparing for depositions of Defendants’ fact and expert witnesses, and for use of exhibits to court filings. Ms. Lynn and Ms. Williams also assisted with cite-checking of Plaintiffs’ memoranda and briefs as well as with e-filings of submissions to the Court. After Ms. Lynn and Ms. Williams left the Firm, Ms. White stepped in and performed a variety of tasks similar to those performed by her predecessors.

15. Mr. Michel’s standard hourly rate as charged by the firm for his services during the Enforcement Phase was \$325.00. Ms. Lynn’s rate was \$210.00/hr.; Ms. William’s rate was \$205.00/hr.; and Ms. White rate was \$190.00/hr. The Legal Assistants’ hourly rates are generally within the range of presumptive reasonableness established by the Adjust *Laffey* Matrix. See Exh. 2 (range, for Paralegal/Law Clerk, from \$187.00/hr. in early 2017 to \$202.00/hr. at present). In any event, pursuant to the PLRA, Plaintiffs seek recovery based on a capped rate of \$150.00/hr. for the Wiley Rein support personnel, whose hours totaled 838.50,

including 386.25 hours for Mr. Michel, 285.00 hours for Ms. Lynn, 118.00 hours for Ms. Williams and 49.25 hours for Ms. White.

16. On the basis of extensive experience over the course of more than 38 years in practice in complex civil litigation matters in Washington, DC, including extensive involvement in civil rights litigation in general and prisoners' conditions cases in particular, I believe that the hours incurred by myself and others at Wiley Rein LLP as referenced above for which recovery is sought by Plaintiffs – which is a small fraction of what the firm has devoted to this case – were reasonably and necessarily incurred in pursuit of the successful result achieved on behalf of the Plaintiffs.

17. As reflected by the firm's Detailed Billing Record (Exh. 1 hereto), the firm incurred litigation-related expenses in the Enforcement Phase totaling \$206,956.34. Deducting from that total the sum of \$122,196.22 attributable to payments for services rendered by the Plaintiffs' experts, Dr. Greifinger and Jackie Clark-Weissman, R.N., as to which recovery is precluded under 42 U.S.C. § 1988, a balance of \$84,760.12 remains. From this amount, a further deduction of \$144.58 for various meals has been made, resulting in a balance of \$84,615.64. Plaintiff seek recovery of this amount as costs reasonably and necessarily incurred in conducting this complex, protracted litigation.

The foregoing matters are true to the best of my personal knowledge, information and belief.

DATED: June 12, 2019

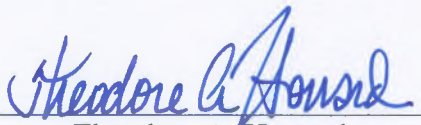

Theodore A. Howard

EXHIBIT 1

Time Report

Billed and Unbilled

Washington Lawyers Committee for Civil / Fluvanna Medical Care Class Action (75459-21)

1/10/2017 - 5/31/2019

Attorney	Name	Description	Orig Hrs	Orig Amt	Rev Hrs	Rev Amt	Rev Rate	First	Last
0611	Talarian, Rachel	Project Assistant	4.00	800.00	-	-	-	06/08/2018	06/08/2018
0612	White, Elizabeth	Legal Assistant	49.75	9,470.00	-	-	-	04/12/2018	01/18/2019
0666	Corbin, Bethany	Associate	10.25	5,842.50	-	-	-	02/08/2018	03/22/2018
0712	Conley, Stephen	Law Clerk	19.00	5,605.00	-	-	-	07/03/2018	07/16/2018
0715	Lee, Tawanna	Law Clerk	14.25	4,203.75	-	-	-	07/20/2018	07/27/2018
0730	Hankin, Eden	Project Assistant	3.20	689.00	-	-	-	08/07/2018	01/24/2019
0828	Barondess, Danielle	Associate	8.50	3,357.50	-	-	-	10/12/2017	10/17/2017
1544	Conway, Michael	eDiscovery Specialist	18.45	5,481.25	-	-	-	02/09/2018	01/22/2019
3747	Howard, Theodore	Partner	1,191.00	933,795.00	-	-	-	01/10/2017	05/06/2019
4600	Jasper-Booker, Whknown	Legal Assistant	4.00	1,100.00	-	-	-	09/05/2017	09/05/2017
5390	Lynn, Hannah	Project Assistant	285.00	59,850.00	-	-	-	06/13/2017	06/08/2018
5693	Michel, Paul	eDiscovery Specialist	386.25	125,531.25	-	-	-	12/18/2017	08/08/2018
8258	Swendsboe, Krystal	Associate	4.30	2,709.00	-	-	-	01/15/2019	01/23/2019
9406	Williams, Rachel	Legal Assistant	118.00	24,190.00	-	-	-	06/12/2017	04/30/2018
			2,115.95	1,182,624.25	-	-	-		

Cost Report

Billed and Unbilled

Washington Lawyers Committee for Civil / Fluvanna Medical Care Class Action (75459-21)

1/10/2017 - 5/31/2019

Service Code	Description	Orig Amt	Rev Amt First	Last
00050	Client Overpaym./Prepymt	(1,947.30)	(1,947.30)	09/19/2018
00070	Court Reporters	981.85	981.85	06/27/2018
00080	Database Res. Service	2,512.89	2,512.89	03/31/2019
00085	Database Res. Service	2,189.55	09/05/2017	01/23/2019
00090	Depositions/Transcripts	48,551.04	04/17/2018	08/31/2018
00105	Office Copying Service	321.00	05/08/2017	08/12/2018
00110	Business Meals	12.00	06/27/2017	06/27/2017
00130	Witness Fees	150.00	06/25/2018	06/25/2018
00160	EDiscovery Processing/Hosting	160.00	03/26/2018	06/08/2018
00165	EDiscovery Processing/Hosting	17,333.93	01/31/2018	04/30/2019
00170	Local Courier Service	193.00	02/15/2018	02/15/2018
00180	Local Transportation	224.61	06/27/2017	08/21/2018
00210	Miscellaneous	580.79	04/18/2017	04/18/2017
00220	Overnight Meals	10.67	05/31/2018	05/31/2018
00230	Overnight Transportation	10.30	03/22/2018	03/22/2018
00250	Travel - Plane/Train Fare	439.00	05/10/2018	05/10/2018
00270	Outside Printing & Duplicating	10,413.96	05/17/2017	06/01/2018
00490	Air Delivery	368.76	05/08/2017	02/21/2019
00630	Consultants	122,196.22	05/31/2017	12/05/2018
00640	Travel - Hotel	1,933.57	05/10/2018	06/19/2018
00650	Travel - Meals	121.91	06/19/2018	06/19/2018
00690	Travel - All Other Exp.	198.59	05/10/2018	07/31/2018
		206,956.34	206,956.34	

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
			Talanian, Rachel	Total		4.00	890.00			4.00	0.00							
			White, Elizabeth	Total		49.75	9,470.00			49.75	0.00							
			Corbin, Bethany	Total		10.25	5,842.50			10.25	0.00							
			Conley, Stephen	Total		19.00	5,605.00			19.00	0.00							
			Lee, Tawana	Total		14.25	4,203.75			14.25	0.00							
			Hankin, Eden	Total		3.20	689.00			3.20	0.00							
			Barondes, Danielle	Total		8.50	3,357.50			8.50	0.00							
			Conway, Michael	Total		18.45	5,481.25			18.45	0.00							
			Howard, Theodore	Total		1,191.00	933,795.00			1,191.00	0.00							
			Jasper-Booker, Whetkown	Total		4.00	1,100.00			4.00	0.00							
			Lynn, Hannah	Total		285.00	59,850.00			285.00	0.00							
			Michel, Paul	Total		386.25	125,531.25			386.25	0.00							
			Swendspoel, Krystal	Total		4.30	2,709.00			4.30	0.00							
			Williams, Rachel	Total		118.00	24,190.00			118.00	0.00							
			Grand Total			2,113.95	1,182,624.25			2,113.95	0.00							

Date	SWTask	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
06/08/2018		Talanian, Rachel	20410	Project Assistant	0	4.00	800.00	200.00	4.00	0.00				0	Unbilled	Quality check documents to make sure the correct page ranges and documents were printed and organize documents in production order, per request of Ms. Lynn (3.0); meet with Ms. Lynn re case and next steps (1.0).	6/2018
		Talanian, Rachel	Total			4.00	800.00		4.00	0.00							
04/12/2018	0612	White, Elizabeth	20410	Project Assistant	0	2.75	522.50	190.00	2.75	0.00		08000		0	Unbilled	Review documents for privileged material and sort responsive documents in preparation for production of materials.	4/2018
04/13/2018	0612	White, Elizabeth	20410	Project Assistant	0	6.50	1,235.00	190.00	6.50	0.00		08000		0	Unbilled	Create log of privileged materials withheld from production for opposing counsel's use	4/2018
04/20/2018	0612	White, Elizabeth	20410	Project Assistant	0	3.75	712.50	190.00	3.75	0.00		08000		0	Unbilled	Review documents to file production of documents	4/2018
05/01/2018	0612	White, Elizabeth	20410	Project Assistant	0	1.50	285.00	190.00	1.50	0.00		08000		0	Unbilled	Review documents to file production of documents	5/2018
06/14/2018	0612	White, Elizabeth	20410	Project Assistant	0	0.25	47.50	190.00	0.25	0.00		08000		0	Unbilled	Correspond with Ms. Elks regarding medical records not yet received	6/2018
06/19/2018	0612	White, Elizabeth	20410	Project Assistant	0	0.25	47.50	190.00	0.25	0.00		08000		0	Unbilled	Correspond with Vicki Collins at VDOC to locate ordered medical records	6/2018
06/25/2018	0612	White, Elizabeth	20410	Project Assistant	0	0.50	95.00	190.00	0.50	0.00		08000		0	Unbilled	Search for files of exhibits to pretrial brief at the request of Mr. Howard	6/2018
07/31/2018	0612	White, Elizabeth	20210	Legal Assistant	0	3.75	712.50	190.00	3.75	0.00		08000		0	Unbilled	Conference call with Ms. and Ms. Simmons to determine division of labor and review (0.75); review finding of facts to ensure accuracy and uniformity of citations (3)	7/2018
08/01/2018	0612	White, Elizabeth	20210	Legal Assistant	0	5.75	1,092.50	190.00	5.75	0.00		08000		0	Unbilled	Review and revise citations in Findings of Fact for accuracy and consistency	8/2018
08/02/2018	0612	White, Elizabeth	20210	Legal Assistant	0	4.75	902.50	190.00	4.75	0.00		08000		0	Unbilled	Review and revise citations in Findings of Fact for accuracy and consistency	8/2018
08/06/2018	0612	White, Elizabeth	20210	Legal Assistant	0	7.00	1,330.00	190.00	7.00	0.00		08000		0	Unbilled	Review citations in Findings of Fact; Conclusions of Law, and Post-Trial Brief, prepare for filing, and file documents	8/2018
08/07/2018	0612	White, Elizabeth	20210	Legal Assistant	0	5.50	1,045.00	190.00	5.50	0.00		08000		0	Unbilled	Prepare courtesy copy of Findings of Fact, Conclusions of Law, and Post-Trial Brief, including trial exhibits, to send to Judge Moon; prepare case notebook of cases cited in Defendants' Brief	8/2018
08/08/2018	0612	White, Elizabeth	20210	Legal Assistant	0	7.00	1,330.00	190.00	7.00	0.00		08000		0	Unbilled	Prepare courtesy copy of Findings of Fact, Conclusions of Law, and Post-Trial Brief, including trial exhibits, to send to Judge Moon; prepare case notebook of cases cited in Defendants' Brief	8/2018
01/18/2019	0612	White, Elizabeth	20210	Legal Assistant	0	0.50	95.00	190.00	0.50	0.00		08000		0	Billed	File motion for extension of time and supporting memorandum of law	1/2019
01/18/2019	0612	White, Elizabeth	20210	Legal Assistant	0	0.50	112.50	225.00	0.50	0.00		08000		0	Unbilled	File motion for extension of time and supporting memorandum of law	2/2019
01/18/2019	0612	White, Elizabeth	20210	Legal Assistant	0	-0.50	-95.00	190.00	-0.50	0.00		08000		0	Billed		2/2019
		White, Elizabeth	Total			49.75	9,470.00		49.75	0.00							
02/08/2018	0666	Corbin, Bethany	10110	Associate	0	3.00	1,710.00	570.00	3.00	0.00		08000		0	Unbilled	Review and analyze (1) background information and case history regarding the Fluvanna Correctional Center for Women class action lawsuit, including the pre-trial order, summary judgment decisions, and settlement agreement, and (2) plaintiffs' requests for production of documents and meet and confer letter.	2/2018
02/14/2018	0666	Corbin, Bethany	10110	Associate	0	1.25	712.50	570.00	1.25	0.00		08000		0	Unbilled	Outline motion to compel document production, focusing particularly on the deficiencies in the document production offered to date and the insufficiency of the general objections.	2/2018
02/18/2018	0666	Corbin, Bethany	10110	Associate	0	1.00	570.00	570.00	1.00	0.00		08000		0	Unbilled	Outline motion to compel document production, focusing particularly on the deficiencies in the document production offered to date and the insufficiency of the general objections.	2/2018
02/23/2018	0666	Corbin, Bethany	10110	Associate	0	1.00	570.00	570.00	1.00	0.00		08000		0	Unbilled	Draft motion to compel discovery responses.	2/2018
02/27/2018	0666	Corbin, Bethany	10110	Associate	0	0.50	285.00	570.00	0.50	0.00		08000		0	Unbilled	Attend meet and confer regarding failure to timely produce discovery responses to client's discovery request.	2/2018
03/20/2018	0666	Corbin, Bethany	10110	Associate	0	1.50	855.00	570.00	1.50	0.00		08000		0	Unbilled	Review and analyze case law regarding whether courts strictly construe the certification requirement in Rule 26(c) and deny motions that do not include the required certification.	3/2018
03/22/2018	0666	Corbin, Bethany	10110	Associate	0	2.00	1,140.00	570.00	2.00	0.00		08000		0	Unbilled	Review and analyze case law requiring a party that asserts overbreadth or undue burden as grounds for avoiding discovery to support such assertions with concrete and factual representations rather than mere conclusory allegations.	3/2018
		Corbin, Bethany	Total			10.25	5,842.50		10.25	0.00							
07/03/2018	0712	Conley, Stephen	10210	Law Clerk	0	1.50	442.50	295.00	1.50	0.00		08000		0	Unbilled	Research whether injunctive relief for a civil contempt show cause motion is assessed at the motion stage or at the hearing stage.	7/2018
07/05/2018	0712	Conley, Stephen	10210	Law Clerk	0	2.00	590.00	295.00	2.00	0.00		08000		0	Unbilled	Research whether injunctive relief for a civil contempt action is assessed at the show cause motion stage or at the hearing stage.	7/2018

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
07/06/2018		Conley, Stephen	10210	Law Clerk	0	0.50	147.50	295.00	0.50	0.00	0.00	08000		0	Unbilled	Researched whether injunctive relief in a civil contempt hearing is assessed at the motion to show cause stage or at the show cause hearing.	7/2018
07/06/2018	0712	Conley, Stephen	10210	Law Clerk	0	2.50	737.50	295.00	2.50	0.00	0.00	08000		0	Unbilled	Researched whether injunctive relief in a civil contempt hearing is assessed at the motion stage or at the show cause hearing.	7/2018
07/06/2018	0712	Conley, Stephen	10210	Law Clerk	0	1.50	442.50	295.00	1.50	0.00	0.00	08000		0	Unbilled	Researched whether injunctive relief is assessed at the date of the motion to show cause or at the show cause hearing.	7/2018
07/06/2018	0712	Conley, Stephen	10210	Law Clerk	0	1.00	295.00	295.00	1.00	0.00	0.00	08000		0	Unbilled	Researched whether injunctive relief is assessed at the time of the motion to show cause or at the show cause hearing in a civil contempt action.	7/2018
07/09/2018	0712	Conley, Stephen	10210	Law Clerk	0	1.00	295.00	295.00	1.00	0.00	0.00	08000		0	Unbilled	Researched whether injunctive relief in a civil contempt hearing is assessed at the motion to show cause or at the show cause hearing.	7/2018
07/09/2018	0712	Conley, Stephen	10210	Law Clerk	0	0.50	147.50	295.00	0.50	0.00	0.00	08000		0	Unbilled	Researched and reviewed whether injunctive relief for civil contempt is assessed at the motion to compel stage or at the contempt hearing.	7/2018
07/09/2018	0712	Conley, Stephen	10210	Law Clerk	0	0.75	221.25	295.00	0.75	0.00	0.00	08000		0	Unbilled	Researched whether injunctive relief for civil contempt is evaluated at the show cause motion stage or at the civil contempt hearing.	7/2018
07/14/2018	0712	Conley, Stephen	10210	Law Clerk	0	3.00	885.00	295.00	3.00	0.00	0.00	08000		0	Unbilled	Researched whether injunctive relief for civil contempt is assessed as of the show cause motion or as of the civil contempt hearing.	7/2018
07/15/2018	0712	Conley, Stephen	10210	Law Clerk	0	3.00	885.00	295.00	3.00	0.00	0.00	08000		0	Unbilled	Drafted and revised research report on whether injunctive relief for civil contempt is assessed from the motion to show cause or from the civil contempt hearing.	7/2018
07/16/2018	0712	Conley, Stephen	10210	Law Clerk	0	1.25	368.75	295.00	1.25	0.00	0.00	08000		0	Unbilled	Revised research report on whether injunctive relief is assessed as of the motion to show cause stage or as of the show cause hearing.	7/2018
07/20/2018		Conley, Stephen	10210	Law Clerk	0	0.25	73.75	295.00	0.25	0.00	0.00	08000		0	Unbilled	Conference with T. Howard re pro bono project regarding the scope of immunity protections.	7/2018
07/23/2018	0715	Lee, Tawanna	10210	Law Clerk	0	3.00	885.00	295.00	3.00	0.00	0.00	08000		0	Unbilled	Review and analyze background information for pro bono project regarding scope of immunity protections.	7/2018
07/24/2018	0715	Lee, Tawanna	10210	Law Clerk	0	2.00	590.00	295.00	2.00	0.00	0.00	08000		0	Unbilled	Conduct legal research for pro bono project regarding scope of immunity protections.	7/2018
07/25/2018	0715	Lee, Tawanna	10210	Law Clerk	0	4.50	1,327.50	295.00	4.50	0.00	0.00	08000		0	Unbilled	Conduct legal research for pro bono project regarding scope of immunity protections.	7/2018
07/26/2018	0715	Lee, Tawanna	10210	Law Clerk	0	1.50	442.50	295.00	1.50	0.00	0.00	08000		0	Unbilled	Draft legal memorandum for pro bono project regarding scope of immunity protections.	7/2018
07/27/2018	0715	Lee, Tawanna	10210	Law Clerk	0	2.50	737.50	295.00	2.50	0.00	0.00	08000		0	Unbilled	Update and revise findings in legal memorandum for pro bono project regarding scope of immunity protections.	7/2018
		Lee, Tawanna	10210	Law Clerk	0	0.50	147.50	295.00	0.50	0.00	0.00	08000		0	Unbilled	Update and revise findings in legal memorandum for pro bono project regarding scope of immunity protections.	7/2018
		Lee, Tawanna				14.25	4,203.75		14.25	0.00						At the request of Mr. Howard, print and organize approximately 40 exhibits to send as courtesy copies after the filing of the post-trial brief in the Fluoride case.	8/2018
08/07/2018	0730	Hankin, Eden	20410	Project Assistant	0	2.50	537.50	215.00	2.50	0.00	0.00	08000		0	Unbilled	At the request of Mr. Howard, organize copies of the cases cited in the Defendants' Brief for an indexed binder.	8/2018
08/08/2018	0730	Hankin, Eden	20410	Project Assistant	0	0.50	107.50	215.00	0.50	0.00	0.00	08000		0	Unbilled	At the request of Ms. Swendsboe, pull cases and treatises from Westlaw.	1/2019
07/16/2017	0828	Barondess, Danielle	10110	Associate	0	0.75	296.25	395.00	0.75	0.00	0.00	08000		0	Unbilled	Review and analyze motion for order to show cause. Discuss assignment with Ted Howard.	10/2017
10/13/2017	0828	Barondess, Danielle	10110	Associate	0	3.00	1,185.00	395.00	3.00	0.00	0.00	08000		0	Unbilled	Review and analyze motion for order to show cause. Research case law in the Fourth Circuit regarding motion standards.	10/2017
10/16/2017	0828	Barondess, Danielle	10110	Associate	0	2.50	987.50	395.00	2.50	0.00	0.00	08000		0	Unbilled	Research case law in the Fourth Circuit regarding threshold standard for motion for order to show cause and effect on an order to show cause on the burden of proof in contempt hearing.	10/2017
10/17/2017	0828	Barondess, Danielle	10110	Associate	0	2.25	888.75	395.00	2.25	0.00	0.00	08000		0	Unbilled	Research case law and draft email write-up addressing threshold standard for motion for order to show cause and effect on an order to show cause on the burden of proof in contempt hearing.	10/2017
02/09/2018	1544	Convey, Michael	20710	eDiscovery Specialist	0	0.50	147.50	295.00	0.50	0.00	0.00	08000		0	Unbilled	Prepare opposing counsel production for addition to document workspace for legal team reference Mr. T. Howard.	2/2018
03/26/2018	1544	Convey, Michael	20710	eDiscovery Specialist	0	2.00	590.00	295.00	2.00	0.00	0.00	08000		0	Unbilled	Prepare load files for third party data to be import to document workspace per Mr. Howard.	3/2018

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
03/27/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	0.50	147.50	295.00	0.50	0.00	0.00	08000		0	Unbilled	Prepare lead files for third party data to be import to document workspace per Mr. Howard.	3/2018
04/02/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	1.50	442.50	295.00	1.50	0.00	0.00	08000		0	Unbilled	Prepare import of images from third party production to document workspace for legal team reference.	4/2018
04/09/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	1.50	442.50	295.00	1.50	0.00	0.00	08000		0	Unbilled	Prepare third party production for import to document management database for legal team reference per Mr. Howard.	4/2018
04/10/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	1.75	516.25	295.00	1.75	0.00	0.00	08000		0	Unbilled	Prepare third party production for import to document management database for legal team reference per Mr. Howard.	4/2018
04/16/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	2.50	737.50	295.00	2.50	0.00	0.00	08000		0	Unbilled	Prepare third party production volume SD1004 for addition to document workspace for legal team reference per Mr. Howard.	4/2018
04/25/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	1.75	516.25	295.00	1.75	0.00	0.00	08000		0	Unbilled	Add third party production to document workspace for legal team reference per Mr. Howard.	4/2018
05/09/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	1.50	442.50	295.00	1.50	0.00	0.00	08000		0	Unbilled	Prepare PDF production records for import to document workspace for legal team reference per Mr. Howard.	5/2018
05/18/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	1.00	295.00	295.00	1.00	0.00	0.00	08000		0	Unbilled	Prepare opposing counsel production volume for import to document workspace for legal team reference per Mr. Howard.	5/2018
05/21/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	1.00	295.00	295.00	1.00	0.00	0.00	08000		0	Unbilled	Prepare two third party production volumes for addition to document workspace for legal team reference per Mr. Howard.	5/2018
05/23/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	1.00	295.00	295.00	1.00	0.00	0.00	08000		0	Unbilled	Prepare third party production data for addition to document workspace for legal team reference per Mr. Howard.	6/2018
06/06/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	0.75	221.25	295.00	0.75	0.00	0.00	08000		0	Unbilled	Prepare addition of opposing counsel production to document workspace per Mr. Howard.	6/2018
06/13/2018		1544	Conway, Michael	20710	eDiscovery Specialist	0	0.50	147.50	295.00	0.50	0.00	0.00	08000		0	Unbilled	Prepare index opposing productions and provide to legal team per Mr. Howard.	1/2019
01/22/2019		1544	Conway, Michael	20710	eDiscovery Specialist	0	0.70	245.00	350.00	0.70	0.00	0.00	08000		0	Unbilled		
			Conway, Michael	Total			18.45	5,481.25		18.45	0.00							
01/10/2017		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Receipt and initial review of draft of letter to VDOC posing requests for documents relating to implementation and enforcement of Settlement Agreement and e-mail communications with co-counsel R. Deane of LAJC regarding same (1.00); continued work on editing of and revisions to VDOC Operating Procedure 801.3 concerning ADA compliance (2.00).	1/2017
01/11/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Review and analysis of Compliance Monitor N. Scharf's final Report regarding October 2016 monitoring visit to FCCW and e-mail communications with co-counsel and telephone conference with plaintiffs medical expert/consultant R. Greifinger, MD., regarding same (2.00); continued editing of and revisions to Plaintiffs' alternative draft of VDOC Operating Procedure 801.3 concerning ADA compliance.	1/2017
01/12/2017		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Continued editing of and revisions to Plaintiffs' alternative draft of VDOC Operating Procedure 801.3 concerning ADA compliance.	1/2017
01/13/2017		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Completed editing of and revisions to Plaintiffs' alternative draft of VDOC Operating Procedure 801.3 concerning ADA compliance.	1/2017
01/15/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Review and analysis of final Report of Compliance Monitor N. Scharf, M.D., with respect to October 2016 monitoring visit to FCCW and drafting of e-memo to Dr. Scharf to express concerns regarding Reports' lack of responsiveness to Plaintiffs' Comments on initial draft of same.	1/2017
01/17/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Completion and transmission of e-memo to Compliance Monitor N. Scharf regarding concerns with respect to substance of final Report for October 2016 monitoring visit to FCCW (1.50); e-mail communications with co-counsel A. Cioffi of Legal Aid Justice Center regarding 8th Amendment implications of pending Virginia State legislative proposal purporting to absolve local jails of responsibility to provide medical care to individuals with pre-existing medical conditions at the time of incarceration (50).	1/2017
01/18/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled		

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
01/19/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	E-correspondence with Compliance Monitor N. Scharf, M.D., regarding pending monitoring issues and follow-up with co-counsel regarding same.	1/2017
01/20/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Participation in conference call of Plaintiff's Litigation Team to discuss status of Settlement Agreement Implementation and enforcement issues and proposed next steps.	1/2017
01/24/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Review of revised draft of Plaintiff's proposed VDOC Operating Procedure 801.3 regarding Americans with Disability Act compliance and final edits and corrections to same.	1/2017
01/26/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Final review of Plaintiff's alternative draft of VDOC Operating Procedure 801.3 and transmittal of same to VDOC counsel R. Vornis for review and comment.	1/2017
01/27/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Review of draft letter from co-counsel A. Turner of Legal Aid Justice Ctr. to VDOC counsel R. Vornis regarding request for meeting with VDOC administrators at FCCW to discuss impending release of seriously ill prisoners and e-mail communications with A. Turner regarding same and related matters (1.00); telephone conference with co-counsel E. Minchberg of WLC regarding current status and anticipate nature and extent of WLC's involvement in case going forward (.50).	1/2017
01/31/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	E-mail communications with co-counsel regarding Settlement Agreement implementation and enforcement matters and related issues.	2/2017
02/13/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Initial review and editing of first draft of Memorandum in Support of Motion for Contempt against VDOC Defendants for violation of Settlement Agreement.	2/2017
02/15/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	T telephone conference with co-counsel A. Turner of LAJC regarding current status (.50); editing of and revisions to draft document request letter to VDOC pursuant to Settlement Agreement document production provisions and transmittal e-memo to co-counsel regarding same (2.50).	2/2017
02/16/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Review of agenda and various attached case materials in preparation for Litigation Team meeting scheduled for 2/17/2017.	2/2017
02/17/2017		3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	08000		0	Unbilled	Preparation for and participation in meeting of Plaintiff's Litigation Team to discuss strategies for moving forward with Settlement Agreement enforcement action and travel time from home to Charlottesville, VA and return.	2/2017
02/20/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Editing of and revisions to draft letter to VDOC providing notice as to violations of its obligations under the Settlement Agreement (1.50); initial review of draft of Dr. Scharf's Report based on his January 2017 monitoring visit to FCCW and transmittal e-mail to co-counsel regarding same (1.00).	3/2017
02/21/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Confirmed review of draft Notice Letter to VDOC in light of Dr. Scharf's current draft Report based on January 2017 monitoring visit to FCCW and e-mail and telephone communications with co-counsel regarding same (1.50); final editing of and revisions to Plaintiff's Document Request Letter to VDOC and transmittal e-mail to VDOC counsel R. Vornis regarding same (1.50).	3/2017
02/22/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Telephone conference with co-counsel A. Turner regarding status in light of Compliance Monitor's release of draft of Report regarding Jan 2017 monitoring visit to FCCW.	3/2017
02/28/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Participation in weekly check-in call of Plaintiff's litigation team.	3/2017
03/02/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Review of draft letter to VDOC counsel R. Vornis and e-mail communications with co-counsel A. Gioff regarding same.	3/2017
03/07/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	E-mail communications with co-counsel at Legal Aid Justice Center regarding concerns arising in connection with latest reports of inadequate care and treatment of clients at FCCW and strategies for responding to same.	3/2017
03/08/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" call of Plaintiff's litigation team regarding Settlement Agreement implementation and enforcement issues, etc.	3/2017
03/09/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	E-mail communications with co-counsel and with counsel for the VDOC, R. Vornis, regarding pending Settlement Agreement implementation and enforcement issues.	3/2017
03/13/2017		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000		0	Unbilled	Preparation of draft of Plaintiff's consolidated comments regarding draft Report of Court-appointed Compliance Monitor N. Scharf concerning January 2017 monitoring visit to FCCW, and e-mail communications with Dr. Scharf and co-counsel A. Turner regarding same.	3/2017

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
03/14/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	08000	0	Unbilled	Participation in weekly "check-in" call of Plaintiff's litigation team regarding status of various tasks relating to Settlement Agreement implementation and enforcement.	3/2017
03/15/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	08000	0	Unbilled	Final editing of and revisions to Plaintiff's consolidated comments to current draft Report of Court-appointed Compliance Monitor N. Scharf, M.D., and transmittal of same to Dr. Scharf.	3/2017
03/17/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	08000	0	Unbilled	Telephone conference with Court-appointed Compliance Monitor N. Scharf, M.D., regarding substance and merits of Plaintiff's consolidated comments to current draft Monitoring Report and e-mail communications with co-counsel regarding same.	3/2017
03/21/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	08000	0	Unbilled	Participation in weekly "check-in" call of Plaintiff's Litigation Team re Settlement Agreement implementation and enforcement issues.	3/2017
03/27/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	08000	0	Unbilled	Review and analysis of VDOC "rebuttal" proposal for ADA Operating Procedure and draft e-memo to co-counsel regarding same.	3/2017
03/28/2017		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	0.00	08000	0	Unbilled	Editing of and revisions to draft of Notice Letter to VDOC concerning alleged breaches of obligations under the Settlement Agreement (2.50); participation in weekly "check-in" call of Plaintiff's Litigation Team regarding Settlement Agreement implementation and enforcement matters (1.00); telephone and email communications with J. King of IT Dept regarding Fluorana Extracel Site access issues (.50).	3/2017
03/29/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	08000	0	Unbilled	Continued editing of and revisions to VDOC Notice Letter regarding breach of Settlement Agreement, and editing of and revisions to draft Demand Letter concerning treatment of FCCW prisoner V. Anselme and email communications with co-counsel regarding same.	3/2017
03/31/2017		3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in meeting of Plaintiff's Litigation Team at Legal Aid Justice Center in Charlottesville, VA to discuss Settlement Agreement enforcement strategies and travel from home to Charlottesville and return travel.	3/2017
04/04/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	08000	0	Unbilled	Review of LAJC payment records regarding copying of medical records for selected FCCW prisoners and submission of invoices to Accounting for reimbursement of copying costs (.50); preparation for and participation in weekly "check-in" call of Plaintiff's litigation team (1.00).	4/2017
04/06/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	08000	0	Unbilled	Review of co-counsel A. Turner's suggested revisions to draft of Notice Letter to VDOC regarding Settlement Agreement enforcement and telephone and email communications with A. Turner regarding same.	4/2017
04/11/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly "check-in" call of Plaintiff's litigation team regarding Settlement Agreement enforcement issues and strategy.	4/2017
04/12/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	08000	0	Unbilled	Revisions to draft letter to VDOC regarding improper limitations on scope of access to clients for purposes of legal visits to FCCW.	4/2017
04/13/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding FCCW legal visit access issues (.70); email communications with VDOC counsel R. Vorhis regarding proposed revisions to VDOC's Operating Procedures for FCCW (30).	4/2017
04/14/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	08000	0	Unbilled	Continued editing of and revisions to draft Notice Letter to VDOC concerning intention to initiate contempt proceedings in light of ongoing breaches of obligations under Settlement Agreement and email communications with co-counsel A. Turner regarding same.	4/2017
04/15/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.00	08000	0	Unbilled	Continued and completed edits to Notice Letter to VDOC regarding prospective contempt proceeding for breach of Settlement Agreement.	4/2017
04/17/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.00	08000	0	Unbilled	Continued work on editing of and revisions to draft Notice Letter to VDOC detailing matters in regard to which it is in breach of Settlement Agreement and email communications with medical consultant R. Gaefinger, M.D., regarding same.	4/2017

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
04/18/2017		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000		0	Unbilled	Continued work on editing of and revisions to draft Notice Letter to VDOC and email communications with co-counsel and telephone conference with medical consultant R. Greifinger, M.D., regarding same (3.00); review and analysis of documents received from VDOC/FCCW regarding death of FCCW prisoner S. Vandeman and draft email report to co-counsel regarding same (1.00); participation in weekly "check-in" call of Plaintiff's litigation team regarding status of Settlement Agreement implementation and enforcement matters (1.00).	4/2017
04/19/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Editing of and revisions to draft Notice Letter to VDOC regarding breaches of Settlement Agreement and transmittal to co-counsel for final review and comment.	4/2017
04/20/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Review of draft letter to VDOC expressing concerns over treatment of Type-1 diabetics of FCCW prisoner T. Gilmer and email communications with co-counsel R. Deane regarding same (1.00); final editing of and revisions to Notice Letter to VDOC regarding breaches of Settlement Agreement and transmittal of same to VDOC counsel R. Vorhis (1.00).	4/2017
04/21/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Review of list of issues of current concern prepared by co-counsel A. Turner for submission to Compliance Monitor N. Schaff, M.D., in anticipation of 4/24/2017 monitoring visit to FCCW and email communications with co-counsel regarding same.	4/2017
04/25/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email exchange with co-counsel at LAJC regarding pending matters of concern.	4/2017
04/28/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel at LAJC regarding client-specific complaint letters to VDOC concerning deficient medical care.	4/2017
05/01/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding general status, comments regarding draft letter to VDOC concerning situation of FCCW resident V. Anselme, etc.	5/2017
05/02/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Participation in weekly check-in call of Plaintiff's Litigation Team.	5/2017
05/03/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Telephone conference with co-counsel B. Castaneda and A. Clout of Legal Aid Justice Center regarding upcoming briefing of Motion for Contempt focused on VDOC's breaches of Settlement Agreement.	5/2017
05/10/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Telephone conf. with P. Fornaci of WLC Prisoners' Project regarding current status.	5/2017
05/15/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Review of email communications from co-counsel regarding status of various deficient medical care problems and concern regarding and inadequate capacity for attorney visits at FCCW.	5/2017
05/16/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" status telephone conference of all Plaintiff's counsel.	5/2017
05/23/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Review and analysis of case file materials in preparation for in-person meeting of Plaintiff's Litigation Team, including VDOC letter in response to Plaintiff's Notice Letter concerning breaches of Settlement Agreement.	6/2017
05/24/2017		3747	Howard, Theodore	10010	Partner	0	8.50	6,587.50	775.00	8.50	0.00	0.00	08000		0	Unbilled	Attendance and participation in meeting of Plaintiff's Litigation Team at Legal Aid Justice Center in Charlottesville, VA and travel time from home to Charlottesville for same and return travel.	6/2017
05/26/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding pending Settlement Agreement enforcement matters and emergent medical care issues at FCCW.	6/2017
05/29/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08011		0	Unbilled	Email communications with co-counsel regarding receipt and transmission of draft report from compliance monitor N. Schaff, M.D., summarizing April 2017 monitoring visit to FCCW.	6/2017
05/30/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" call with Plaintiff's Litigation Team.	6/2017
06/01/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Location in case file and transmission of deposition transcript requested by co-counsel A. Clout of LAJC (1.00); review and editing of draft of status update letter to clients and email communication with co-counsel B. Castaneda regarding same (30).	6/2017
06/02/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Review and analysis of filings regarding contempt claims for breach of class action settlements in preparation for drafting of Motion for Order to Show Cause and supporting Memorandum.	6/2017
06/03/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Began work on drafting of Motion for Order to Show Cause as to why VDOC should not be held in contempt of court for its widespread violations of the parties' Court-approved Settlement Agreement and supporting Memorandum of Law.	6/2017

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
06/04/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel A. Turner of LAJC regarding status: continued work on drafting of Motion for Order to Show Cause.	6/2017
06/08/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Email exchange with VDOC counsel R. Vortis regarding VDOC's need for Plaintiff's position on proposed revisions to VDOC Operating Procedures (.50); review and editing of draft cover letter and draft Motion for Temporary Restraining Order addressing VDOC's failure to assure adequate access of attorneys at FCCW for purposes of client visits and email communications with co-counsel B. Castaneda re same (1.50).	6/2017
06/10/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Continued work on drafting of Motion for Contempt papers.	6/2017
06/12/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Conference and email communications with B.E. Powers to arrange for legal assistant help with fact-checking of class member Declarations intended to support Motion for Contempt.	6/2017
06/13/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Conference with Legal Assist. R. Williams and H. Lynn regarding nature and scope of Plaintiff's Declarations Fact-Checking project (.50); participation in weekly "check-in" call of Plaintiff's Litigation Team (1.00).	6/2017
06/15/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Receipt and review of ex parte communication from Compliance Monitor N. Scharff, M.D., regarding settlement implementation matters, and telephone and email communications with expert-consultant R. Greifinger and email communications with co-counsel B. Castaneda regarding same.	6/2017
06/16/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Participation in telephone conference with all co-counsel regarding strategy for responding to ex parte communication received from Compliance Monitor N. Scharff, M.D., and work on initial draft of proposed response.	6/2017
06/17/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Continued work on Plaintiff's comments regarding draft Report of Compliance Monitor N. Scharff, M.D.'s April 2017 visit to FCCW (2.00); review of VDOC's revised Operating Procedures per terms of Settlement Agreement and provision of comments regarding same to VDOC counsel R. Vortis (1.00).	6/2017
06/18/2017		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000		0	Unbilled	Continued work on Plaintiff's comments regarding draft Report of Compliance Monitor N. Scharff, M.D.'s April 2017 visit to FCCW and communications with LAJC co-counsel A. Turner regarding same.	6/2017
06/19/2017		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Continued work on Plaintiff's consolidated comments to Dr. Scharff's draft Report addressing most recent monitoring visit to FCCW and email communications with LAJC co-counsel A. Turner regarding same.	6/2017
06/20/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" telephone conference of Plaintiff's Litigation Team (1.00); final editing of and revisions to Plaintiff's consolidated comments on Dr. Scharff's draft Report regarding April 2017 monitoring visit to FCCW and transmittal of same to Dr. Scharff (2.50).	6/2017
06/22/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Review and editing of draft of letter to VDOC counsel R. Vortis to follow up on Plaintiff's Document Requests to VDOC for documents reflecting VDOC's implementation of the parties' Settlement Agreement and email communications with LAJC co-counsel S. Ellis regarding same (1.50); review of comments and suggestions from LAJC co-counsel A. Croft concerning proposed response to ex parte communication from Compliance Monitor N. Scharff, M.D. (1.00).	6/2017
06/23/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Final editing of and revisions to letter to VDOC Counsel R. Vortis setting forth Plaintiff's follow-up Document Requests (.50); telephone conference and conference with Legal Assistants R. Williams and H. Lynn regarding status of fact-checking of clients' Declarations supporting Motion for Contempt (.50).	6/2017
06/24/2017		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000		0	Unbilled	Resumed work on Memorandum in support of Motion for Order to Show Cause as to why Defendants should not be held in civil contempt for breach of obligations under Settlement Agreement.	6/2017
06/25/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Continued work on draft of Memorandum in support of Contempt Motion and email communications with co-counsel regarding same.	7/2017
06/26/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Preparation for and participation in telephone conference with LAJC co-counsel B. Castaneda, A. Turner and A. Croft regarding strategy for briefing of Contempt Motion.	7/2017

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
06/27/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Continued work on Memorandum in support of Contempl Motion (1.00); participation in weekly "check-in" call of Plaintiff's litigation team (1.00); meeting with Legal Assist. H. Lynn and R. Williams to discuss results of fact-checking of class members' Declarations intended to support Contempl Motion and follow-up email to co-counsel regarding same (1.50).	7/2017
06/28/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Editing of and revisions to proposed response on behalf of Plaintiffs to Compliance Monitor N. Scharf, M.D.'s informal proposal for conciliation between parties' representatives and draft e-memo to co-counsel regarding same.	7/2017
06/29/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Continued work on Memorandum in support of proposed Contempl Motion (1.00); final editing of and revisions to draft e-memo to Compliance Monitor N. Scharf, M.D., and email communications with co-counsel regarding same (1.00).	7/2017
06/30/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with LAJC co-counsel and with Legal Assist. H. Lynn and R. Williams regarding ongoing fact-checking of Declarations of class members intended to support Contempl Motion.	7/2017
07/05/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Transmittal of e-memo to Compliance Monitor N. Scharf, M.D., regarding proposal concerning informal conciliation with VDOC and follow-up with co-counsel regarding same (1.00); review of documents received from VDOC concerning death of FCCW prisoner D. Taylor.	7/2017
07/07/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel S. Ellis of LAJC regarding follow-up with respect to monthly review of deceased FCCW prisoner D. Taylor.	7/2017
07/08/2017		3747	Howard, Theodore	10010	Partner	0	5.50	4,262.50	775.00	5.50	0.00	0.00	08000		0	Unbilled	Continued work on Plaintiffs' Motion for Contempl and supporting Memorandum and review and analysis of file documents and case authorities for same.	7/2017
07/09/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Continued work on Motion for Contempl and supporting Memorandum.	7/2017
07/10/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Review of response email from Compliance Monitor N. Scharf, M.D. concerning conciliation proposal and email communications with LAJC co-counsel B. Castaneda regarding same (1.00); continued preparation of Contempl Motion papers (1.50).	7/2017
07/11/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Review of media coverage regarding recently-settled Americans with Disabilities Act case against Florida Dept of Corrections involving issues similar to those in pending ADA dispute with VDOC and email communications with co-counsel re same (1.00); continued work on drafting of Motion for Contempl papers and draft transmittal email to co-counsel forwarding efforts for review and comment (2.00).	7/2017
07/12/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Continued work on drafting of Memorandum in support of Plaintiffs' Motion for Contempl and email communications with co-counsel regarding same.	7/2017
07/23/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Continued work on drafting of and revisions to Memorandum in support of Plaintiffs' Motion for Contempl.	7/2017
07/24/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Continued drafting of and revisions to Memorandum in support of Plaintiffs' Motion for Contempl.	7/2017
07/25/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Draft e-memo to co-counsel regarding revised draft of Memorandum in support of Contempl Motion (3.00); participation in conference call of all Plaintiffs' counsel regarding current status, pending matters and new developments (1.00).	7/2017
07/29/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Initial review of records transmitted by FCCW concerning death of FCCW prisoner C. Liberto and draft e-memo to LAJC co-counsel A. Turner and S. Ellis regarding same.	7/2017
07/31/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Telephone conference with co-counsel A. Turner of LAJC regarding status with respect to Motion for Contempl and supporting Memorandum.	7/2017
08/03/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Email and telephone communications with Settlement Agreement Compliance Monitor N. Scharf, M.D., regarding status and draft e-memo to co-counsel reporting same.	8/2017
08/04/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Participation in telephone conferences of entire Plaintiff's litigation team and with co-counsel B. Castaneda and A. Clifton of LAJC regarding status of work on Motion for Contempl briefing, related matters, and suggested next steps.	8/2017

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
08/06/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review of draft memorandum in Settlement Agreement Compliance Monitor N. Scharf, M.D., concerning pending issues of concern to Plaintiffs in advance of next monitoring visit to FCCW and email communications with co-counsel A. Turner regarding same.	8/2017	
08/08/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel at LAJC regarding recent developments and current status.	8/2017	
08/09/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Telephone conference with colleagues at LAJC to discuss preparation for meeting with newly-assigned lead counsel from VA Attorney General's Office.	8/2017	
08/10/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Telephone conference with co-counsel A. Turner of LAJC regarding outcome of meeting with new opposing counsel and next steps.	8/2017	
08/11/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Resumed work on Memorandum in support of Plaintiff's Motion for Order to Show Cause as to why Defendant VDOC should not be held in civil contempt for breach of Settlement Agreement.	8/2017	
08/15/2017		3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Motion for Order to Show Cause regarding Defendants' breach of Settlement Agreement.	8/2017	
08/16/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly telephone conference of all Plaintiffs' counsel regarding current status and next steps, and follow-up identification and transmission of medical records for deceased FCCW prisoner C. Liberto to LAJC co-counsel S. Ellis.	8/2017	
08/17/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Continued work on drafting and editing of Memorandum in support of Contempt Motion.	8/2017	
08/18/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Plaintiffs' Contempt Motion and email communications with co-counsel regarding same.	8/2017	
08/20/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Plaintiffs' Contempt Motion.	8/2017	
08/21/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Motion for Contempt.	8/2017	
08/22/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Motion for Contempt.	8/2017	
08/23/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly "check-in" call of all Plaintiffs' counsel to address strategy and next steps.	8/2017	
08/25/2017		3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Legal research regarding case authorities addressing nature and scope of civil contempt sanctions (2.50); review and analysis of FCCW Mortality Review Reports for deceased FCCW prisoners D. Niece and C. Liberto and follow-up communications with co-counsel and with Plaintiffs' correctional medical expert-consultant R. Greifinger, M.D. regarding same (2.00).	8/2017	
08/27/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Continued work on Memorandum in support of Motion for Contempt.	8/2017	
08/28/2017		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000	0	Unbilled	Review of Mortality Review Reports provided by FCCW concerning the deaths of FCCW prisoners D. Niece and C. Liberto, transcript of same to Plaintiffs' correctional medical care expert/consultant R. Greifinger, M.D., telephone conference with Dr. Greifinger regarding same and email communications with co-counsel regarding substance of comments and concerns expressed by Dr. Greifinger (2.50); continued work on editing of and revisions to Memorandum in support of Plaintiffs' Motion for Contempt (3.50).	9/2017	
08/29/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on revised draft of Memorandum in support of Plaintiffs' Motion for Contempt (2.50); email communications with Dr. Greifinger concerning follow-up regarding VDOC/Amor Mortality Review Reports for D. Niece and C. Liberto (.50).	9/2017	
08/30/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continue work on revised draft of Memorandum in support of Plaintiffs' Motion for Contempt (2.00); preparation for and participation in weekly telephone conference of all Plaintiffs' counsel regarding status, etc. (1.00).	9/2017	
08/31/2017		3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000	0	Unbilled	Email communications with Settlement Agreement Compliance Monitor N. Scharf, M.D., concerning timing issues with respect to issuance of draft of next Monitoring Report (.50); telephone conference with Plaintiffs' correctional medical care expert/consultant R. Greifinger, M.D., regarding Mortality Review issues and follow-up e-memo to co-counsel regarding same (1.00); continued work on editing of and revisions to Memorandum in support of Plaintiff's Motion for Contempt (3.00).	9/2017	

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
09/01/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Review and editing of draft letter from co-counsel to newly-designated lead VDOC counsel regarding nature and scope of unresolved Settlement Agreement implementation issues and Plaintiffs' pending information requests and email communications with LAJC co-counsel regarding same.	9/2017
09/04/2017		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Review and analysis of VDOC /Amor death report and records for recently-deceased prisoner M. Johnson and draft e-memo to co-counsel regarding same (1.50); continued editing of and revisions to Memorandum in support of Motion for Contempt (2.50).	9/2017
09/05/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Final editing of and revisions to Memorandum in support of Contempt Motion, including integration of cite-checking revisions, proofreading Table of Authorities, etc., and transmittal memo conveying final draft to LAJC co-counsel.	9/2017
09/06/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel and Firm Marketing Dept regarding media coverage for filing of Contempt Motion and supporting submissions.	9/2017
09/07/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Initial review of draft of Dr. Schaff's Monitoring Report for his August 2017 visit to FCCW and draft transmittal email to co-counsel regarding same.	9/2017
09/11/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email and telephone communications with LAJC co-counsel B. Castaneda, S. Ellis and A. Turner regarding strategic approach to discovery in support of Contempt Motion and related matters.	9/2017
09/13/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" call of all Plaintiffs' counsel regarding case status and proposed next steps.	9/2017
09/18/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding VDOC's Motion for Enforcement of Time to respond to Plaintiff's Motion for Contempt.	9/2017
09/19/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel and telephone conference with VDOC Counsel regarding inadvertent filing of incorrect motion for extension of time to respond to Plaintiffs' Motion for Contempt and proposed solutions.	9/2017
09/20/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Participate in weekly "check-in" call of Plaintiffs' counsel regarding status, strategy for next steps, etc.	9/2017
09/25/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Work on review and editing of LAJC's co-counsel's comments concerning Dr. Schaff's current draft report regarding August 2017 monitoring visit to FCCW.	10/2017
09/26/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Review of FCCW/Amor Monthly Review Report regarding death of FCCW prisoner M. Johnson and draft e-memos to co-counsel and to Plaintiffs' medical expert/consultant R. Greifinger, M.D., regarding same.	10/2017
09/27/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Telephone conference with Plaintiffs' medical care expert/consultant R. Greifinger, M.D., concerning impressions of VDOC/Amor Monthly Review Report addressing death of FCCW prisoner M. Johnson and draft e-memo to co-counsel regarding same (1.50); participation in weekly "check-in" call of Plaintiffs' counsel (1.00); continued work on review and editing of LAJC co-counsel's comments on current draft Report of Compliance Monitor N. Schaff, M.D. (1.00).	10/2017
09/28/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Preparation for and participation in telephone conference of co-counsel with Compliance Monitor N. Schaff, M.D., regarding Plaintiffs' concerns with current draft monitoring Report (2.50); continued work on review and editing of LAJC co-counsel's comments on draft Schaff Report (1.00).	10/2017
09/29/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Continued work on review and editing of LAJC co-counsel's comments to draft monitoring Report of N. Schaff, M.D.	10/2017
10/01/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Completed review and editing of LAJC co-counsel's comments to Dr. Schaff's current draft monitoring Report and email communications with LAJC co-counsel A. Turner, B. Castaneda and S. Ellis regarding same.	10/2017
10/02/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Recent and initial review of Monitoring Report of Dr. Schaff based on August 2017 visit to FCCW and drafting of transmittal memorandum conveying initial impressions of Report to co-counsel.	10/2017
10/09/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" call of Plaintiffs' Counsel.	11/2017
10/11/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Organization and transmittal to all co-counsel of e-memo summarizing 10/11 Conference Call and outlining initial reactions to Defendants' Opposition to Plaintiffs' Motion for Order to Show Cause re Contempt and other related matters.	11/2017
10/12/2017		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled		11/2017

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
10/16/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Completed editing of and revisions to transmittal letter concerning VDOC's proposed ADA Operating Procedure (1.50); review of D Bandross' preliminary research results addressing legal standard governing issuance of Order to Show Cause and draft e-memo to co-counsel regarding same and related matters (1.00).	11/2017
10/17/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Final edits and revisions to correspondence to Compliance Monitor N. Scharf, M.D., regarding VDOC's proposed ADA Operating Procedure and transmittal of same to Dr. Scharf (1.00); review and analysis of D. Bandross legal research addressing standards for issuance of Order to Show Cause (1.00).	11/2017
10/18/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Scanning and electronic transmission of materials to Compliance Monitor N. Scharf, M.D., regarding VDOC's ADA policy.	11/2017
10/19/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review and analysis of e-memo from co-counsel S. Eils concerning deconstruction of VDOC critique of Declarations supporting VDOC's Opposition to Plaintiff's Motion for Order to Show Cause.	11/2017
10/20/2017		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel A. Cioffi of WLC regarding strategic considerations relevant to scheduling of hearing date on Plaintiff's Contempt Motion.	11/2017
10/22/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Initial drafting of Plaintiff's Reply Memorandum in response to VDOC's Opposition to Plaintiff's Motion for Order to Show Cause.	11/2017
10/23/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on revising and editing draft of Plaintiff's Reply Memorandum in support of their Motion for Order to Show Cause and email and telephone communications with co-counsel at LAJC regarding same.	11/2017
10/24/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Continued work on drafting of Plaintiff's Reply Memorandum in support of Motion for Order to Show Cause and communications with co-counsel re same.	11/2017
10/25/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly check-in call of Plaintiff's Litigation Team (1.00); continued work on drafting of Plaintiff's Reply Memorandum (1.00).	11/2017
10/26/2017		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Continued and completed drafting of Plaintiff's Reply Memorandum in support of Motion for Order to Show Cause, editing of and revisions to same, and transmittal of same to all co-counsel for review and comment.	11/2017
10/27/2017		3747	Howard, Theodore	10010	Partner	0	10.00	7,750.00	775.00	10.00	0.00	0.00	08000	0	Unbilled	All-day meeting of Plaintiff's counsel team at LAJC in Charlottesville, VA and driving time from home to Charlottesville and return travel.	11/2017
10/29/2017		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Review of consolidated comments of all co-counsel to draft of Plaintiff's Reply Memorandum in support of Motion for Order to Show Cause.	11/2017
10/30/2017		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000	0	Unbilled	Completed editing of and revisions to Reply Memorandum in support of Motion for Order to Show Cause and transmittal memorandum to co-counsel regarding same.	11/2017
10/31/2017		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000	0	Unbilled	Final editing of and revisions to Reply Memorandum and transmittal of same to co-counsel for filing (2.00); began work on draft of letter to Compliance Monitor N. Scharf, M.D., addressing Plaintiff's concerns with most recent Monitoring Report (3.00).	11/2017
11/01/2017		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly conference call of Plaintiff's counsel (1.00); continued drafting of letter to Compliance Monitor N. Scharf, M.D., addressing Plaintiff's concerns with most recent Monitoring Report and email communications with LAJC co-counsel A. Cioffi regarding same (1.50).	11/2017
11/02/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Telephone conference with WLC co-counsel A. Cioffi concerning planning for upcoming activities in anticipation of evidentiary hearing on Plaintiff's Contempt Motion (1.50); email communications with B. Powers regarding needed Legal Assistant help with management of document discovery in advance of evidentiary hearing (50).	11/2017
11/07/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding concerns with respect to recent stip-searching of clients prior to legal visits with counsel and with co-counsel regarding VDOC written medical grievance procedure.	11/2017
11/08/2017		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in weekly check-in call of Plaintiff's Litigation Team (1.00); participation in telephone conference with co-counsel and VDOC counsel regarding pending procedural and discovery scheduling matters (1.00); e-memo transmittal to Plaintiff's expert-consultant R. Cretlinger, M.D., concerning VDOC's revised Continuous Quality Improvement policy and review and revisions to draft letter to VDOC counsel regarding medical grievances procedure revisions (1.00).	11/2017

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
11/09/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Telephone communications with Plaintiff's expert/consultant R. Greifinger M.D., concerning VDOC's revised draft CQI policy and draft e-memo to co-counsel concerning same.	11/2017
11/13/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email exchange with co-counsel regarding various matters of concern arising in conjunction with pending Motion for Civil Contempt and proposed strategies for going forward.	11/2017
11/14/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding status (50); review and editing of draft e-memo to Compliance Monitor N. Scharff, M.D., concerning on-going medical care problems associated with FCCW's excessive utilization of Licensed Practical Nurses in place of more qualified medical professionals and e-mail communications with co-counsel regarding same (1.00); email communications with co-counsel concerning proposed procedural schedule for discovery and related matters leading up to evidentiary hearing on Motion for Civil Contempt (50).	11/2017
11/15/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Review and editing of LAJC co-counsel B. Castaneda's draft of letter to VDOC addressing Plaintiff's concerns with revised co-pay policy and email communications with B. Castaneda re same..	11/2017
11/16/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Review and editing of revised draft of letter to VDOC prepared by LAJC and comments and suggestions regarding VDOC draft of Continuous Quality Improvement Program (50); review of draft of proposed Consent Motion concerning access to records of mentally-incompetent FCCW prisoners unable to provide knowing consent to disclosure and email communications with LAJC co-counsel A. Cioffi regarding same (50); email communications with LAJC co-counsel regarding comments and suggestions concerning draft email to Compliance Monitor N. Scharff M.D., addressing ongoing problems with performance of Licensed Practical Nurses entrusted by FCCW with diagnosis and treatment responsibilities (1.00).	11/2017
11/17/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" call of Plaintiff's Litigation Team (1.00); email communications with co-counsel A. Cioffi concerning communications with Compliance Monitor N. Scharff, M.D., regarding various pending matters (1.00).	11/2017
11/20/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Email communications with LAJC co-counsel B. Castaneda and A. Cioffi regarding VDOC's revised co-payment policy and draft letter to Compliance Monitor N. Scharff, M.D., respectively.	11/2017
11/21/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Final editing of and revisions to letter to Compliance Monitor N. Scharff, M.D., setting forth Plaintiff's counsel's concerns with performance of the monitoring process, email communications with LAJC co-counsel A. Cioffi regarding same, and transmittal of letter to Dr. Scharff.	11/2017
11/22/2017	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Email communications with LAJC co-counsel regarding Dr. Scharff's initial reaction to Plaintiff's letter expressing concerns about monitoring activities.	11/2017
11/27/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Preparation for and participation in telephone conference with Legal Assis. R. Williams and H. Lynn and LAJC co-counsel A. Cioffi and S. EEs regarding planning for VDOC document production during discovery phase of preparations for hearing on Plaintiff's Motion for Contempt and follow-up email communications with R. Williams regarding same.	11/2017
11/28/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Preparation for and participation in telephone conference with LAJC co-counsel to determine strategy for proceeding in light of Compliance Monitor N. Scharff, M.D.'s response to letter expressing Plaintiff's concerns with his performance of monitoring function.	11/2017
11/29/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Preparation for and participation in weekly "check-in" call of Plaintiff's counsel regarding status and proposed next steps (1.00); email and telephone communications with Compliance Monitor N. Scharff regarding scheduling of call to discuss substance of Plaintiff's letter addressing monitoring methodology issues (50).	11/2017

Date	SM/Task	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
11/30/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Preparation for and participation in telephone conference with Compliance Monitor N. Schaff, M.D., to discuss substance of letter from Plaintiffs criticizing aspects of performance of monitoring functions and proposed solutions (1.50); review and analysis of case materials relevant to ADA and Continuous Quality Improvement (CQI) policies at FCCW in preparation for meeting with opposing counsel (1.00).	12/2017
12/01/2017	3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	08000		0	Unbilled	Preparation for and participation in meeting with co-counsel and VDOC counsel at LAJC in Charlottesville, concerning various unresolved pending matters including VDOC's draft Americans with Disabilities Operating Procedure, and travel to Charlottesville and return travel to home for same.	12/2017
12/03/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Draft and transmission of e-memo to VDOC Defendants' counsel regarding 12/1 meeting and proposed next steps including scheduling of next meeting.	12/2017
12/04/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Review and editing of Plaintiffs First Set of Document Requests to VDOC re Contempli Issues.	12/2017
12/05/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Continued editing of and revisions to Plaintiffs First Set of Requests for Documents to VDOC re Contempli Issues and email communications with co-counsel A. Cioffi regarding same.	12/2017
12/06/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" call of Plaintiffs' Litigation Team regarding case status and strategy.	12/2017
12/07/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Review and editing of revised draft of Document Requests to VDOC regarding Contempli Issues and provisions of comments regarding same to co-counsel.	12/2017
12/08/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Review of revised and proposed final draft of Plaintiffs' Document Requests to VDOC and email communications with co-counsel A. Cioffi regarding same.	12/2017
12/10/2017	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Further editing of and revisions to draft Request for Production of Documents to be served on VDOC (1.00); draft e-memo to VDOC Counsel concerning Plaintiffs' intention to request a Status Conference and transmittal to co-counsel for review and comment (.50).	12/2017
12/12/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Final editing of and revisions to Document Requests to VDOC and email communications with co-counsel A. Cioffi regarding same.	12/2017
12/13/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" call of Plaintiffs' Litigation Team.	12/2017
12/15/2017	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Editing of and revisions to draft memorandum to opposing counsel regarding Plaintiffs' intention to request a Status Conference and transmittal of same.	12/2017
12/18/2017	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Draft e-memo to opposing counsel D. Abato concerning Document Production Protocol issues and follow-up with co-counsel A. Cioffi and Legal Asst. R. Williams concerning same.	12/2017
12/19/2017	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Participation in telephone conference of Plaintiffs' counsel with Compliance Monitor N. Schaff, M.D., concerning initial reactions to and comments regarding most recent monitoring report and follow-up with co-counsel regarding same (1.50); email communications with Legal Asst. R. Williams and P. Michele of Plaintiffs' Litigation Support regarding Document Production Protocol issues (1.00).	12/2017
12/20/2017	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Preparation for and participation in telephone conference with co-counsel and counsel for VDOC regarding Document Production Protocol issues and follow-up with R. Williams and P. Michele regarding same (1.50); participation in weekly "check-in" call of Plaintiffs' Litigation Team (1.00); organization of materials needed for participation in 12/21/17 meeting with opposing counsel (1.00).	12/2017
12/21/2017	3747	Howard, Theodore	10010	Partner	0	9.00	6,975.00	775.00	9.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel A. Cioffi and P. Michele of Lit. Support regarding draft response to counsel for VDOC concerning Doc. Production Protocol issues (1.00); preparation for and participation in meeting of Plaintiffs' and Defendants' counsel to confer regarding various pending settlement-related matters at VA Attorney General's Office in Richmond, VA and travel time regarding same (8.00).	12/2017
12/22/2017	3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Request of co-counsel B. Castaneda (1.00); email communications with co-counsel A. Cioffi and P. Michele of Lit. Support regarding revisions to draft Doc. Production Protocol based upon 12/20/17 call with opposing counsel and transmittal of same to opposing counsel D. Abato and R. Vornis (2.00).	12/2017

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluvarna Medical Care Class Action (73499-21)

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
12/27/2017		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Review of e-mail from opposing counsel regarding Document Production Protocol and follow-up communications with co-counsel and with P. Michel of Litigation Support regarding same.	12/2017
12/28/2017		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	E-mail communications with co-counsel A. Clout and S. Ellis of Legal Aid Justice Center regarding possible contact with prospective replacement compliance monitor candidates and regarding revised draft of Plaintiff's Initial Disclosures.	12/2017
12/29/2017		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Telephone and e-mail communications with opposing counsel D. Abalo concerning initiation of VDOC's rolling document production (.50); work on drafting of Plaintiff's response to VDOC's stated position with respect to pending Document Production Protocol issues and e-memo to P. Michel of Litigation Support concerning same (3.00).	12/2017
01/02/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Email communications with P. Michel of Litigation Support and with opposing counsel D. Abalo regarding revised draft of Document Production Protocol.	1/2018
01/03/2018		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Participation in weekly "check-in" call of Plaintiff's Litigation Team (1.00); email communications with opposing counsel D. Abalo regarding Document Production Protocol and VDOC email production issues (1.00); review of comments of co-counsel and integration into Plaintiff's Consolidated Comments re draft Report of Dr. Schaff summarizing November 2017 Compliance Monitoring Visit to FCCW (2.00).	1/2018
01/04/2018		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000		0	Unbilled	Continued work on integration and synthesis of all co-counsel input into Plaintiff's Consolidated Comments to current draft Schaff Report (5.00); email communications with opposing counsel D. Abalo regarding concerns with respect to logistics, cost and timing of VDOC email production and email communications with co-counsel regarding same (1.00).	1/2018
01/05/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Integration of and final editing of and revisions to Plaintiff's Consolidated Comments to Schaff Monitoring Report and draft transmittal email to N. Schaff, M.D., regarding same.	1/2018
01/07/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Draft e-memo to opposing counsel regarding scheduling of conference call to discuss issues associated with production of VDOC emails responsive to Plaintiff's Document Requests.	1/2018
01/09/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Participation in telephonic conference with co-counsel and opposing counsel D. Abalo concerning production issues with respect to VDOC emails responsive to Plaintiff's Document Requests.	1/2018
01/10/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Email communications with P. Michel of Litigation Support and opposing counsel D. Abalo regarding pending VDOC document production matters (1.50); participation in weekly conference call of Plaintiff's Litigation Team and follow-up with co-counsel regarding same (1.50).	1/2018
01/11/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Internal communications with P. Michel of Litigation Support and email communications with co-counsel and with opposing counsel regarding VDOC email production issues (1.50); email communications with co-counsel A. Clout concerning expert witness discovery scheduling matters (1.00).	1/2018
01/12/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Telephone conference with Plaintiff's correctional medical care expert consultant R. Greifinger, M.D., concerning status and next steps in preparation for hearing on Motion for Contempt and follow-up e-memo to co-counsel regarding same.	1/2018
01/16/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding various pending discovery and expert witness issues.	1/2018
01/17/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Participation in weekly call of Plaintiff's litigation team (1.00); email communications with co-counsel and with counsel for VDOC regarding pending discovery matters (1.00).	1/2018
01/18/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Telephone conference with co-counsel and counsel for VDOC concerning pending discovery matters (1.00); participation in training re use of Relativity document database provided by P. Michel of IT Dept and email communications with co-counsel regarding same (1.50); telephone conference with co-counsel A. Clout concerning possible conflict-of-interest issues presented by appearance of E. McNelis and E. Muldowney of Sands Anderson firm as co-counsel for VDOC (.50).	1/2018

Date	SMTask	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
01/19/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Telephone and email communications with co-counsel regarding prospective Motion to Disqualify concerning VDOC's new co-counsel, Sands Anderson; possible retention of Correctional Nursing Expert J. Clarke; and pending discovery issues concerning VDOC's document production.	1/2018
01/21/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Transmission of electronic copies of relevant materials to Plaintiff's correctional medicine expert/counselant R. Greifinger, M.D., to assist in preparation of expert report in support of Contempt Motion and email communications with co-counsel S. Ellis regarding same.	1/2018
01/22/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding conflict-of-interest concerns presented by VDOC's retention of former Armor counsel as co-counsel (1.00); email communications with expert R. Greifinger, M.D., regarding evidentiary matters (.50).	2/2018
01/23/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding pending discovery matters and scheduling of requested status conference.	2/2018
01/24/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel and participation in weekly Plaintiff's Litigation Team conference call.	2/2018
01/25/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Review and editing of Motion to Amend Scheduling Order to include Expert Report deadlines (.50); draft and transmission of emails to co-counsel re deposition scheduling and to opposing counsel re email production priorities (1.00).	2/2018
01/26/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding pending discovery matters and prospective motion for disqualification.	2/2018
01/28/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Review and analysis of case file materials and preparation for 1/29 Status Conference and participation in Plaintiff's Litigation Team meeting regarding discovery and trial preparation.	2/2018
01/29/2018		3747	Howard, Theodore	10010	Partner	0	9.00	6,975.00	775.00	9.00	0.00	0.00	09000	0	Unbilled	Participation in telephonic Status Conference and Plaintiff's Litigation Team meeting at co-counsel's office in Charlottesville, VA and round-trip travel for same.	2/2018
01/30/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000	0	Unbilled	Email communications with expert R. Greifinger, M.D., regarding evidence to be reviewed in connection with preparation of report (.50); email communications with opposing counsel concerning Status Conference (.50); telephone conference with opposing counsel concerning pending discovery matters (.50); work with co-counsel and legal assist. H. Lynn on finalization and electronic transmission of document subpoenas to VUA an UVC Medical Centers (2.00).	2/2018
01/31/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding discovery status, deposition scheduling and related matters (1.00); telephone conference with opposing counsel concerning changing status of medical care contractor Armor Correctional Health at FCCW and implications of same for ongoing contempt dispute and draft email to co-counsel reporting on same (1.00); telephone and email communications with representative of VCU Board of Visitors concerning document subpoena served upon VCU Health System (1.00).	2/2018
02/01/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Email communications with opposing counsel regarding deposition scheduling and related discovery matters (1.00); email communications with expert R. Greifinger, M.D., and with P. Michel of IT Dept regarding transmittal of electronic discovery materials for Dr. Greifinger's review (.50).	2/2018
02/02/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Preparation and service of Notices of Deposition for VDOC witnesses J. Dillman, S. Herick, D. Whitehead and E. Aldridge (1.50); telephone conf. with co-counsel A. Croft regarding pending discovery matters (.50); meeting with associate B. Corbin to discuss assistance with discovery matters (.50); conference and email communications with P. Michel of IT Dept regarding pending ESI issues (.50).	2/2018
02/05/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Continued review and editing of Document Requests to be served via Plaintiff's Subpoena Duces Tecum to Armor Correctional Health Services, Inc. and email communications with co-counsel A. Croft regarding same.	2/2018

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
02/06/2018		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel and colleagues H. Lynn and R. Williams regarding preparation of spreadsheet chart depicting parties' disputes to accompany anticipated Motion to Compel addressing VDOC's deficient production of documents responsive to Plaintiff's Request (1.00); continued and completed revisions to Document Requests to accompany Plaintiff's document subpoena to Amcor Correctional Health Servs., Inc. and transmittal and service of same (2.00); drafting of meet-and-confer letter to VDOC Counsel regarding VDOC's failure to provide email discovery from VDOC officials and employees (1.00).	2/2018
02/07/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	08000	0	Unbilled	Participation in weekly Scott Team conference call (1.00); email communications with Caplan, Caplan & Caplan, Process Servers of Miami, FL re service of document subpoena upon Amcor Correctional Health (1.50); drafting of meet-and-confer letter to VDOC Counsel regarding email discovery issue (2.00).	2/2018
02/08/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	08000	0	Unbilled	Telephone and email communications with expert witness R. Greifinger, MD, regarding initial reactions to review of clients' medical records and follow-up e-memo to co-counsel regarding same (1.50); final editing of and revisions to meet-and-confer letter to VDOC counsel addressing VDOC email discovery issue and transmittal of same (1.00); conference with associate B. Corbin to discuss provision of assistance with pending discovery disputes.	2/2018
02/09/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel A. Cioffi regarding scheduling of depositions (1.50); telephone conference with opposing counsel D. Abate in response to Plaintiff's request to meet and confer concerning VDOC email discovery and follow-up e-memo to co-counsel regarding same (1.50); transmittal of VDOC COI Report re FCOW to expert witness R. Greifinger, MD and email communications with same re same (1.50); work on preparation for drafting of Motion to Compel with respect to deficiencies in VDOC response to Plaintiff's Document Requests (1.00).	2/2018
02/12/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	08000	0	Unbilled	Telephone conference with opposing counsel in response to Plaintiff's meet-and-confer letter re VDOC email production responsive to Plaintiff's Document Requests and email to co-counsel summarizing same.	2/2018
02/13/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	08000	0	Unbilled	Telephone and email communications with Plaintiff's expert witness R. Greifinger and follow-up communications with co-counsel regarding nature and scope of his anticipated expert report (1.50); conference with Legal Asst. H. Lynn regarding collection and preparation of documentary exhibits for deposition of VDOC Health Services Director S. Herick (1.50).	2/2018
02/14/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	08000	0	Unbilled	Drafting of Plaintiff's second meet-and-confer letter addressing deficiencies in VDOC's responses to Plaintiff's Document Requests.	2/2018
02/15/2018		3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	0.00	08000	0	Unbilled	Final editing of and revisions to Plaintiff's follow-up meet-and-confer letter to VDOC and transmittal of same to opposing counsel (1.00); drafting of e-memo to VDOC counsel providing Plaintiff's Initial Expert Witness Disclosures (1.50); telephone conference with expert R. Greifinger, M.D., regarding substance and scope of expert report and draft e-memo to co-counsel regarding same (1.50); work with Legal Asst. H. Lynn on assembly of possible exhibits for use in deposition of VDOC Health Servs. Director S. Herick and review and analysis of same to prepare for deposition (2.50).	2/2018
02/16/2018		3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	0.00	08000	0	Unbilled	Conducting of deposition of VDOC Health Servs. Director S. Herick and travel time to Richmond, VA and return travel for same.	2/2018
02/19/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.00	08000	0	Unbilled	Initial review of first draft of Report of Plaintiff's correctional medical expert, R. Greifinger, M.D., and email communications with Dr. Greifinger regarding same.	3/2018
02/20/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	08000	0	Unbilled	Participation in telephone conference with co-counsel and Plaintiff's expert witnesses J. Clark, R.N. and R. Greifinger, M.D., regarding status and proposed next steps to coordinate preparation of expert reports in support of Plaintiff's Contempt Motion.	3/2018

Date	SMTrask	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
02/21/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel and opposing counsel regarding request of Armor/ Correctional Health Servs. for additional time to produce documents requested by Plaintiffs' third-party subpoena (1.50); email communications with co-counsel S. Ellis regarding status of responses by UVA and VCU Medical Centers to Plaintiffs' third-party document subpoenas (2.00)	3/2018
02/22/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding pending document discovery matters including scheduling of meet-and-confer telephone conference with VDOC counsel to address concerns with document production in response to Plaintiffs' Document Requests.	3/2018
02/23/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel A. Ciolfi regarding status and pending discovery matters.	3/2018
02/26/2018		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000	0	Unbilled	Continued drafting of Memorandum in support of Motion for Preliminary Injunction and email communications with Library Research Staff regarding research assistance needed in connection with same.	3/2018
02/26/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Preparation for 227 meet-and-confer conference call with opposing counsel regarding unresolved document production concerns and email communications with co-counsel regarding same.	3/2018
02/27/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Preparation for and participation in meet-and-confer telephone conference with co-counsel and VDOC counsel regarding Plaintiffs' concerns with deficiencies in VDOC's document production response to Plaintiffs' Document Requests.	3/2018
03/01/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Emails to co-counsel A. Ciolfi and S. Ellis regarding intended follow-up on various items pending and unaddressed due to pending obligations in other cases relating to document discovery matters.	3/2018
03/04/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Review and editing of updated revised draft of expert report of R. Greifinger, M.D., and email communications with Dr. Greifinger regarding same.	3/2018
03/05/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Email communications with Dr. Greifinger regarding further revisions to draft expert report (1.50); follow-up with legal assistant H. Lynn regarding status of responses to medical records subpoenas to UVA and VCU Medical Centers (1.50); telephone conference with L. Fleming of UVA General Counsel's Office regarding additional procedural requirements to trigger response to medical records subpoena (1.50); email communications with co-counsel regarding preparation for participation in upcoming meet-and-confer telephone conference with opposing counsel (1.50)	3/2018
03/06/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in telephone conference of Plaintiffs' counsel with Compliance Monitor N. Schaff, M.D., regarding current draft report (1.00); participation in telephone conference of Plaintiffs' attorneys with expert witness J. Clark regarding matters ideally to be covered by report (1.00); email communications with co-counsel regarding preparations for upcoming discovery meet-and-confer call with Defendants' counsel and review of relevant discovery materials regarding same (1.00).	3/2018
03/07/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Participation in meet-and-confer telephone conference of Plaintiffs' counsel with counsel for VDOC concerning pending document discovery issues (1.00); participation in regularly-scheduled call of Plaintiffs' Litigation Team concerning status of all pending matters and next steps (1.00); review of VDOC's expert witness disclosures and transcripts of same to Dr. Greifinger for review and comment (1.50).	3/2018
03/08/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Initial review of VDOC's Motion for Protective Order, to Modify Scheduling Order and for Continuance and email and telephone communications with co-counsel regarding same (1.50); transmittal to opposing counsel of information regarding Plaintiffs' unresolved Document Requests and proposed next steps regarding VDOC's response to same (1.50).	3/2018
03/09/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Telephone conf. with L. Fleming of UVA Gen. Counsel's Office concerning required certification letter as required provisions of VA Code, preparation of same and submission of same in regard to medical records subpoena (1.50); email communications with co-counsel A. Ciolfi regarding proposed response to Defendants' counsel's inquiry regarding pending discovery matters (1.50); telephone conference with legal assistant H. Lynn regarding status of medical records subpoena to VCU Med. Center (1.50).	3/2018

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03/11/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	08000	0	Unbilled	Review of co-counsel comments on draft of expert report of R. Greifinger, M.D. and email communications with Dr. Greifinger regarding same (2.00); work on analysis and integration of co-counsel comments on draft of current report of Compliance Monitor N. Schaff, M.D., based upon February 2018 monitoring visit to FCCW (1.00); email communications with counsel for Amor Correctional Health regarding its response to Plaintiffs' Document Request (1.50).	3/2018
03/12/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	08000	0	Unbilled	Continued work on analysis and consolidation of Plaintiffs' counsel comments on draft of Compliance Monitor Schaff's report on Feb. 2018 monitoring visit to FCCW (2.50); email communications with R. Greifinger, M.D. regarding revisions to draft expert report (1.00).	3/2018
03/12/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	0.00	08000	0	Unbilled	Editing of and revisions to revised draft of R. Greifinger, M.D.'s expert report and email communications with Dr. Greifinger regarding same (2.00); continued work on Plaintiffs' integrated comments to draft of Compliance Monitor Schaff's report summarizing Feb. 2018 monitoring report and review of Dr. Schaff's final report (1.50); email communications with Litigation Support assistant P. Michel regarding preparation of Plaintiffs' Response to Defendants' First Request for Production of Documents and email communications with Defendants' counsel regarding same (1.00).	3/2018
03/13/2018		3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	0.00	08000	0	Unbilled	Participation in meet-and-confer telephone conference of Plaintiffs' counsel with Defendants' counsel regarding Plaintiffs' Rule 30(b)(6) deposition notice to VDOC (1.00); participation in weekly call of Plaintiff's Litigation Team (1.00); review of proposed draft Protective Order submitted by counsel for Amor Correctional Health and email communications with co-counsel and counsel for Amor regarding same (1.50); work with Plaintiffs' expert R. Greifinger, M.D., on revisions to expert report and coordination of provision of additional documents for review by Dr. Greifinger in connection with same (3.00).	3/2018
03/14/2018		3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	0.00	08000	0	Unbilled	Telephone and email communications with R. Greifinger, M.D. on final editing of and revisions to expert report and work with legal assistant H. Lynn on transmission of documents to be reviewed by Dr. Greifinger in connection with same (4.00); drafting of Plaintiffs' Rule 26 Expert Disclosure Statement for Transmittal to Defendants with Plaintiffs' Expert Reports (1.00); preparation and service of Subpoena and Notice of Deposition to Dr. T. Gable of Amor Correctional Health (1.00); email communications with co-counsel regarding work product issues arising in connection with Defendants' Document Request for communications between Plaintiffs' counsel and Compliance Monitor N. Schaff, M.D. (1.00); transmittal of Plaintiffs' consolidated comments on draft monitoring report to Dr. Schaff (1.00).	3/2018
03/15/2018		3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	0.00	08000	0	Unbilled	Participation in meeting of Plaintiffs' Litigation Team regarding discovery and trial preparation matters and travel from home to Charlottesville, VA and return travel.	3/2018
03/16/2018		3747	Howard, Theodore	10010	Partner	0	10.00	7,750.00	775.00	10.00	0.00	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding issue concerning responsibility for travel expenses associated with depositions of parties' expert witnesses and regarding interpretation of intended scope of Protective Order governing Plaintiffs' Rule 34 inspection of FCCW (1.50); initial review of Defendants' Motion for Protective Order, to Amend Scheduling Order and for Continuance (1.00).	3/2018
03/18/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	0.00	08000	0	Unbilled	Work with P. Michel and R. Williams to coordinate service of Plaintiffs' Objections and Responses to Defendants' First Request for Production of Documents and accompanying document production (1.50); review and editing of Plaintiffs' response to Defendants' meet-and-confer letter concerning Plaintiffs' Rule 30(b)(6) Deposition Notice to VDOC and email communications with co-counsel regarding same (1.50); review of updated VDOC Document Production Summary Chart and email communications with co-counsel regarding same (2.00); work on Plaintiffs' Opposition to Defendants' Motion for Protective Order and other relief (1.50).	3/2018
03/19/2018		3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	0.00	08000	0	Unbilled		3/2018

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
03/20/2018		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000		0	Unbilled	Receipt and initial review of client medical records produced by UVA Med. Ctr. in response to third-party document subpoena and conference with legal assistant H. Lynn regarding same (1.50); conferences and email communications with P. Mitchell and R. Williams to address technological issues with Plaintiff's document production to Defendants (1.00); further review and editing of VDOC Document Production Summary Chart and email communication with co-counsel regarding same (1.50); email communication with co-counsel regarding issue raised by Defendants' counsel with Plaintiff's Rule 30(b)(5) Notice to VDOC (1.00).	3/2018
03/21/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Participation in weekly call of Plaintiff's Litigation Team (1.50); continued work on Plaintiff's Opposition to Defendants' Motion for Protective Order and other relief (1.00).	3/2018
03/22/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Initial review of Defendant's Opposition to Plaintiff's Motion for Preliminary Injunction and supporting papers and email communications with co-counsel regarding same.	3/2018
03/22/2018		3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	08000		0	Unbilled	Drafting of Memorandum of Law in Opposition to Defendants' Motion for Protective Order and Other Relief and email communications with co-counsel regarding same.	3/2018
03/23/2018		3747	Howard, Theodore	10010	Partner	0	7.00	5,425.00	775.00	7.00	0.00	0.00	08000		0	Unbilled	Completed drafting of Plaintiff's Opposition to Defendants' Motion for Protective Order and Other Relief, editing of and revisions to same, organization and completion of supporting exhibits, and work with legal assistant H. Lynn regarding filing and service of same (6.00); telephone and email communications with co-counsel B. Castaneda regarding crafting and transmission of response to Defendants' inquiries regarding evidentiary citations in Dr. Greifinger's expert report (1.00).	3/2018
03/23/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Telephone conference with WLC co-counsel C. Dinean and H. Lieberman regarding preliminary thoughts concerning Reply to Defendant's Opposition to Plaintiff's Motion for Preliminary Injunction and draft e-memo to Wiley Team regarding research assistance with respect to preparation of Plaintiff's Reply Brief, Preparation and transmission of e-memos to Defendants' counsel regarding discovery and trial preparation issues.	3/2018
03/26/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Draft letter to and e-correspondence with Mag. Judge Hoppe's Chambers regarding sealed exhibit supporting Plaintiff's Memorandum in Opposition to Defendant's Motion for Protective Order and other relief (1.50); email communications with co-counsel concerning various pending discovery matters (2.00).	4/2018
03/27/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Editing of and revisions to VDOC Document Production Chart, telephone conference with co-counsel A. Cioffi regarding same and transmittal of same to Defendants' counsel (1.50); email communications with co-counsel regarding various pending discovery matters (1.00).	4/2018
03/29/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding pending discovery matters (1.00); e-memo to Defendants' counsel regarding outstanding discovery requests and status of response (1.50).	4/2018
03/30/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel and Defendants' counsel regarding pending discovery matters.	4/2018
04/09/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel, opposing counsel and G. Constantine of Veritek, Inc., regarding evolving deposition schedule (1.50); email communications with P. Mitchell and H. Lynn regarding discovery responses and related matters (1.50).	4/2018
04/10/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding deposition scheduling and logistical planning for same.	4/2018
04/11/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Participation in weekly Plaintiff's Litigation Team call (1.00); drafting of Subpoena and Notice of Deposition for N. Schmitt, M.D. and e-service of same (1.00).	4/2018
04/12/2018		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Preparation for and participation in parties' telephone hearing with Mag. Judge Hoppe addressing Defendants' Motion for Protective Order regarding Plaintiff's Rule 30(b)(5) Deposition Notice to VDOC (1.50); telephone conference with Plaintiff's correctional medical care expert R. Greifinger regarding planning for preparation for upcoming deposition (1.50); oversight and supervision of Plaintiff's document production in response to Defendants' Second Request for Documents and email and telephone conferences with P. Mitchell and H. Lynn regarding same (2.00).	4/2018

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
04/13/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Editing of and revisions to draft Rule 30(b)(6) Notice of Deposition to Amor, Correctional Health Services, Inc. and electronic service of same upon Amor Counsel (1.50); transmission of record materials to Plaintiff's expert witness R. Greifinger, M.D., for review in preparation for upcoming deposition (1.00).	4/2018
04/14/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Review and editing of draft log of withheld documents to accompany Plaintiff's production in response to Defendants' Second Request for Documents and email communications with H. Lynn regarding same.	4/2018
04/15/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Review and analysis of Defendants' expert reports and supporting materials in preparation for preparing Plaintiff's expert, G. Greifinger, M.D., for upcoming deposition.	4/2018
04/16/2018		3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	08000		0	Unbilled	Email communications and conferences with P. Michel and H. Lynn regarding privilege log and pending issues relating to Plaintiff's response to Defendants' Third Request for Documents (2.50); email communications with co-counsel and opposing counsel regarding relocation of R. Greifinger deposition and rescheduling of N. Schaff deposition and telephone and email communications with G. Constantine of Veritek regarding same (1.50); gathering of information concerning partial depositions of Defendants' witnesses J. Diltman, T. Gable and S. Herick for purposes of review to prepare plaintiff's expert R. Greifinger, M.D. for deposition (2.50).	4/2018
04/17/2018		3747	Howard, Theodore	10010	Partner	0	10.00	7,750.00	775.00	10.00	0.00	0.00	08000		0	Unbilled	Review of transcripts of depositions of Defendants' witnesses during travel from Washington, DC to New York, NY for purposes of meeting with R. Greifinger, M.D. to prepare for deposition by Defendants (4.00); meeting with D. Greifinger to prepare for deposition (5.50); telephone conf. with P. Michel regarding document production issues arising in connection with Plaintiff's supplemental production in response to Defendants' First Request for Documents (50).	4/2018
04/18/2018		3747	Howard, Theodore	10010	Partner	0	10.00	7,750.00	775.00	10.00	0.00	0.00	08000		0	Unbilled	Defending of Defendants' deposition of Plaintiff's correctional medical expert R. Greifinger, M.D. (7.00); return travel from New York, NY to Washington, DC (2.00).	4/2018
04/19/2018		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Draft e-memo to co-counsel summarizing R. Greifinger deposition and issues arising in connection with same (1.50); email communications with co-counsel, Defendants' counsel and G. Constantine of Veritek concerning deposition scheduling and logistics (1.00); began work on drafting of Plaintiff's Memorandum in Opposition to Defendants' Motion to Extend Time And/or to Strike (1.50).	4/2018
04/20/2018		3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	08000		0	Unbilled	Completed drafting of Plaintiff's Opp. to Defendants' Mot. to Extend Time And/or for Stay, editing of and revisions to same, and assistance with e-filing of same (4.00); participation in meet-and-confer telephone conference with co-counsel and opposing counsel regarding Amor 30(b)(6) Deposition (1.50); draft e-memo to co-counsel regarding proposal by Defendants' counsel to postpone trial and commence settlement negotiations (1.00); conference with Legal Asst. H. Lynn regarding status of preparation of logs of documents withheld from Plaintiff's productions in response to Defendants' Second and Third Requests for Documents (1.00).	4/2018
04/22/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Review of outline for Plaintiff's deposition of Compliance Monitor N. Schaff, M.D. and conference with co-counsel A. Clouff regarding same.	5/2018
04/23/2018		3747	Howard, Theodore	10010	Partner	0	7.00	5,425.00	775.00	7.00	0.00	0.00	08000		0	Unbilled	Attendance and participation in Plaintiff's deposition of Compliance Monitor N. Schaff, M.D., and multiple conferences with co-counsel A. Clouff regarding same.	5/2018
04/24/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Conference with co-counsel A. Clouff regarding completion of Schaff deposition, current discovery status and next steps (1.00); email communications with G. Constantine of Veritek regarding logistical arrangements for videoconference deposition of Defendants' expert A. Joshua, M.D. (50).	5/2018
04/25/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Participation in videoconference deposition of Defendants' expert A. Joshua, M.D., and multiple conferences with co-counsel B. Castanedes regarding same.	5/2018
04/27/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Participation in videoconference deposition of Defendants' expert A. Joshua, M.D., and multiple conferences with co-counsel B. Castanedes regarding same.	5/2018

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluorana Medical Care Class Action (75459-21)

Date	SMWtask	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
04/28/2018		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000	0	Unbilled	Review of relevant record documents and other materials to prepare for Rule 30(b)(6) deposition of VDOC.	5/2018
04/29/2018		3747	Howard, Theodore	10010	Partner	0	7.50	5,812.50	775.00	7.50	0.00	0.00	08000	0	Unbilled	Review and analysis of record documents and related materials in preparation for Rule 30(b)(6) deposition of VDOC, drafting of outline for oral examination and email communications with co-counsel A. Cioffi regarding same.	5/2018
04/30/2018		3747	Howard, Theodore	10010	Partner	0	13.00	10,075.00	775.00	13.00	0.00	0.00	08000	0	Unbilled	Rule 30(b)(6) deposition of VDOC designated witness S. Henrick, Ph.D., and conferences with co-counsel A. Cioffi regarding same (7:50); participation with co-counsel D. Abalo, v. Petrus and K. Londo (1:50); travel to Richmond, VA for deposition and return travel (4:00).	5/2018
05/01/2018		3747	Howard, Theodore	10010	Partner	0	5.50	4,262.50	775.00	5.50	0.00	0.00	08000	0	Unbilled	Editing and revisions to Plaintiff's Logs for documents withheld from productions in response to Defendants' Second and Third Requests, telephone conf. with co-counsel S. Ellis and conference with legal assistant H. Lynn regarding same (3:00); email communications with co-counsel E. Hanes to provide factual background information for Plaintiff's Opposition to Amior Motion for Protective Order with respect to Rule 30(b)(6) Deposition Notice (1:00); email communications with opposing counsel D. Abalo regarding VDOC provision of records concerning death of VDOC prisoner D. Reed (1:00); email communications with opposing counsel N. Schetler regarding rescheduling of uncompleted Rule 30(b)(1) deposition of VDOC Health Services Administrator S. Henrick (5:00).	5/2018
05/02/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000	0	Unbilled	Email communications with opposing counsel N. Schetler regarding rescheduling of remainder of Rule 30(b)(1) deposition of S. Henrick (5:00); email communications with co-counsel regarding Plaintiff's position on Defendants' Motion requesting that case be referred for mediation (5:00).	5/2018
05/03/2018		3747	Howard, Theodore	10010	Partner	0	8.50	6,587.50	775.00	8.50	0.00	0.00	08000	0	Unbilled	Attendance and participation in trial preparation meeting of Plaintiff's Litigation Team at Legal Aid Justice Center in Charlottesville, VA and round trip travel time for same.	5/2018
05/04/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Final editing of and revisions to Plaintiff's Privilege Logs and service of same upon opposing counsel (1:00); telephone conference with co-counsel A. Cioffi and review of emails from co-counsel regarding discovery status, scheduling of mediation, etc. (1:00).	5/2018
05/06/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Telephone conference with Plaintiff's medical expert R. Griefinger, M.D., concerning possible preparation of rebuttal report to respond to opinions of Defendants' expert witnesses.	5/2018
05/07/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Communications with co-counsel regarding pending discovery matters and preparation for hearing on pending motions.	5/2018
05/08/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000	0	Unbilled	Email communications with opposing counsel regarding withheld documents reflecting Plaintiff's ex parte communications with Compliance Monitor N. Schaff, M.D. (1:00); preparation for and participation in conference call of Plaintiff's counsel to prepare for Court-ordered Mediation (1:50).	5/2018
05/09/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000	0	Unbilled	Communications with co-counsel regarding preparation for upcoming Mediation and related matters (5:00); participation in weekly call of Plaintiff's Litigation Team regarding pending discovery matters, trial preparation, etc. (1:50).	5/2018
05/10/2018		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000	0	Unbilled	Receipt and review of draft Rebuttal Report of Plaintiff's medical expert R. Griefinger, M.D. (1:00); review of draft of Settlement Outline and provision of comments to co-counsel A. Cioffi regarding same (1:00); communications with opposing counsel N. Schetler regarding rescheduling of resumed deposition of VDOC Health Servs. Director S. Henrick (5:00); preparation for and participation in telephonic motions hearing of all counsel with Maj. Judge Hoppe (3:50).	5/2018
05/11/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000	0	Unbilled	Communications with opposing counsel regarding rescheduling of S. Henrick deposition (5:00); preparation for and participation in telephone conference of Plaintiff's counsel with Mediator M. Rubin in preparation for upcoming Mediation (2:00); review and editing of co-counsel A. Cioffi's initial draft of Plaintiff's Confidential Mediation Statement and email communications with same re same (5:00).	5/2018

Date	SMTask	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
05/12/2018	3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding notice from UVA Medical Center of rejection of proposal by VDOC to assume responsibility for provision of medical care at FCCW and implications of same for upcoming Mediation and parties settlement discussions.	5/2018
05/13/2018	3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	Email communications with G. Constantine of Veritek concerning scheduling of upcoming depositions and related logistics (50); review of co-counsel A. Cloutts draft of Plaintiffs' Mediation Statement and email communications with same regarding same (2.00).	5/2018
05/14/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Continued communications with co-counsel and with G. Constantine of Veritek regarding court reporter arrangements for upcoming depositions (.50); email communications with co-counsel and Plaintiffs' expert R. Greifinger, M.D., concerning preparation of proposed rebuttal expert report (1.50).	5/2018
05/15/2018	3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000		0	Unbilled	Email communications with Plaintiffs' expert R. Greifinger concerning possible rebuttal report (.50); conference with K. White of Library Research Staff regarding requested research concerning applicability of Prison Lit. Reform Act attorney hourly rate cap in the context of post-judgment enforcement proceedings (1.00); email communications with co-counsel concerning dispute with Defendants' counsel over Plaintiffs' proposed use of Dr. D. Young, FCCW OBGYN, as a fact witness (.50); review and editing of co-counsel A. Cloutts draft of proposed Opening Statement for Mediation (1.00); organization and review of relevant case documents in preparation for participation in Mediation (2.00).	5/2018
05/16/2018	3747	Howard, Theodore	10010	Partner	0	20.50	15,887.50	775.00	20.50	0.00	0.00	08000		0	Unbilled	Preparation for and participation with co-counsel and client representatives in Mediation of contempt motion dispute (15.50); driving time from home to Charlottesville and from Charlottesville to home (5.00).	5/2018
05/17/2018	3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000		0	Unbilled	Preparation for resumed Rule 30(b)(1) deposition of VDOC Health Services Director S. Henrick, conferences with legal assistant H. Lynn regarding preparation of exhibits for same and email communications with co-counsel regarding same.	5/2018
05/18/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Telephone conference with co-counsel concerning discovery issue arising in connection with expert witness G. Lewis, Ph.D., and confidentiality restrictions on some of the materials upon which he relied in developing his expert opinions.	5/2018
05/18/2018	3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	08000		0	Unbilled	Preparation for and conducting of resumed deposition of VDOC Health Services Director S. Henrick (4.00); travel time to and from Richmond, VA for same (4.00).	5/2018
05/19/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Draft e-memo to co-counsel addressing substance of defense witness S. Henrick's Rule 30(b)(6) deposition testimony (1.00); initial review of draft of Statement of Facts for Plaintiffs' Preliminary Brief and email communications with co-counsel regarding same (1.00).	6/2018
05/20/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Telephone and email communications with Plaintiffs' correctional medical expert T. Greifinger, M.D., concerning preparation of Rebuttal Report (1.50); email communications with co-counsel addressing aftermath of Mediation and next steps concerning possible continuance of trial date (.50).	6/2018
05/22/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Preparation of draft Table of Contents for Plaintiffs' Preliminary Brief and circulation of same to co-counsel for preliminary review (1.50); email communications with co-counsel regarding status of research on timing of contempt issue (.50).	6/2018
05/24/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Editing of and revisions to Dr. Greifinger's draft Rebuttal Report and telephone conference with same re same.	6/2018
05/25/2018	3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Telephone conference with Dr. Greifinger regarding suggested final revisions to Rebuttal Report, review of final draft of same and transmittal of same to co-counsel (1.00); participation with co-counsel in telephone conference with Compliance Monitor N. Schaff, M.D., regarding comments on draft Monitoring Report for April 2018 visit to FCCW (1.00); work on drafting of Plaintiffs' Preliminary Brief (1.50).	6/2018
05/26/2018	3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000		0	Unbilled	Drafting of Plaintiffs' Preliminary Brief (5.00); review of revised draft of Statement of Facts for same (1.00).	6/2018
05/27/2018	3747	Howard, Theodore	10010	Partner	0	7.00	5,425.00	775.00	7.00	0.00	0.00	08000		0	Unbilled	Continued drafting of Plaintiffs' Preliminary Brief.	6/2018
05/28/2018	3747	Howard, Theodore	10010	Partner	0	8.00	6,200.00	775.00	8.00	0.00	0.00	08000		0	Unbilled	Continued drafting of Plaintiffs' Preliminary Brief and editing of and revisions to same.	6/2018

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
05/29/2018		3747	Howard, Theodore	10010	Partner	0	12.50	9,687.50	775.00	12.50	0.00	0.00	08000		0	Unbilled	Completed drafting of Plaintiff's Pretrial Brief, editing of and revisions to same, legal research for same, compilation for exhibits to same, and multiple email and telephone communications regarding same, and work with Legal Asst. H. Lynn regarding electronic filing of same.	6/2018
05/30/2018		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000		0	Unbilled	Communications with opposing counsel D. Abate regarding VDOC's untimely production of Morbidly & Mortally Review for deceased FCCW prisoner D. Reed (1.00); participation in telephone hearing of all counsel with Mag. Judge Hoppe concerning pending motions (2.00); draft letter to Judge Moore's Chambers regarding transmittal of courtesy copy of Plaintiff's Pretrial Brief and supporting Exhibits (.50); draft email memo to Mag. Judge Hoppe's Chambers concerning submission of sealed Exhibit filed in support of Plaintiff's Pretrial Brief (.50); email communications with co-counsel regarding status and next steps concerning trial preparation (1.00).	6/2018
05/31/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding various pending trial preparation and pretrial matters.	6/2018
06/01/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Various trial preparation activities, including email communications with co-counsel regarding finalizing of Plaintiff's Exhibit List.	6/2018
06/02/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Work on various trial preparation matters.	6/2018
06/03/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Telephone conference and email communications with co-counsel A. Clout regarding draft of Plaintiff's Opposition to Defendants' Motion for Summary Judgment.	6/2018
06/04/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000		0	Unbilled	Review and analysis of Plaintiff's expert R. Greifinger, M.D.'s initial and rebuttal reports and draft e-memo to co-counsel C. Nash or Kelly & Crandall concerning viable arguments for Opposition to Defendants' Motion to Strike and Exclude Dr. Greifinger's Expert Testimony.	6/2018
06/05/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Telephone conference with co-head counsel A. Clout of LAJC regarding trial preparation and strategy issues.	6/2018
06/06/2018		3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000		0	Unbilled	Working with Legal Asst. H. Lynn on identification and gathering of documents cited and relied upon by Dr. Greifinger in initial and rebuttal expert reports for use as possible trial exhibits (2.50); various trial preparation-related activities, including review of prior briefs and submissions to the Court, Compliance Monitors' Reports, etc (2.50).	6/2018
06/07/2018		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000		0	Unbilled	Review and analysis of pending pretrial motions in preparation for hearing on same and oral arguments on 6/8 and telephone conferences and email communications with co-counsel regarding same (4.50); draft email communications with Accounting Dept regarding request for prompt payment of outstanding bill of expert witnesses and court reporting service (.50); email communications with co-counsel P. Michael or Lili Support, and H. Lynn, Legal Asst., regarding status of Document Production to Defendants of documents obtained via ex parte document requests to VDOC and UVA medical center (1.00).	6/2018
06/08/2018		3747	Howard, Theodore	10010	Partner	0	12.50	9,687.50	775.00	12.50	0.00	0.00	08000		0	Unbilled	Attendance and participation in hearing convened by Court on all remaining pretrial motions in Lynchburg, VA and driving time from office to Lynchburg and Lynchburg to home.	6/2018
06/09/2018		3747	Howard, Theodore	10010	Partner	0	9.00	6,975.00	775.00	9.00	0.00	0.00	08000		0	Unbilled	Organization and aggregation of all case file materials needed for trial (5.50); participation in conference call with co-counsel regarding trial preparation (1.00); driving time from home to Charlottesville, VA for trial (2.50).	6/2018
06/10/2018		3747	Howard, Theodore	10010	Partner	0	10.50	8,137.50	775.00	10.50	0.00	0.00	08000		0	Unbilled	Drafting of comprehensive outline of direct testimony for Plaintiff's medical care R. Greifinger, M.D., and meeting with Dr. Greifinger to work on preparation of direct testimony (9.50); other general trial preparation (1.00).	6/2018
06/11/2018		3747	Howard, Theodore	10010	Partner	0	12.00	9,300.00	775.00	12.00	0.00	0.00	08000		0	Unbilled	Attendance and participation in first day of trial on Plaintiff's Motion for Contempt, including presentation of direct testimony of Plaintiff's medical expert witness R. Greifinger, M.D., and preparation with co-counsel for second day of trial.	6/2018
06/12/2018		3747	Howard, Theodore	10010	Partner	0	12.00	9,300.00	775.00	12.00	0.00	0.00	08000		0	Unbilled	Attendance and participation in second day of trial on Plaintiff's Motion for Contempt, including preparation and presentation of argument to the Court on Defendants' Motion for Judgment at conclusion of Plaintiff's case-in-chief, conference with co-counsel to recap second day of trial, and preparation for third day of trial.	6/2018

Date	SWTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
06/13/2018		3747	Howard, Theodore	10010	Partner	0	12.00	9,300.00	775.00	12.00	0.00	0.00	0.00	0.00	0	Unbilled	Attendance and participation in third day of trial on Plaintiff's Motion for Contempt, including cross-examination of Health Services Director of VDOC, Stephen Henrick, Ph.D., conference with co-counsel to recap third trial day, and preparation for fourth day of trial.	6/2018
06/14/2018		3747	Howard, Theodore	10010	Partner	0	16.00	12,400.00	775.00	16.00	0.00	0.00	0.00	0.00	0	Unbilled	Attendance and participation in fourth day of trial on Plaintiff's Motion for Contempt, and conference with co-counsel to recap fourth trial day (8:50); review of deposition transcript and other case materials to prepare for cross-examination of Defendants' medical care expert A. Joshua, M.D. (3:50); drafting of Plaintiff's Closing Argument and exchange of emails with co-counsel regarding same (4:00).	6/2018
06/15/2018		3747	Howard, Theodore	10010	Partner	0	12.00	9,300.00	775.00	12.00	0.00	0.00	0.00	0.00	0	Unbilled	Preparation for and attendance at Plaintiff's Motion for Contempt, including cross-examination of Defendants' medical care expert A. Joshua, M.D. and communications with the Court regarding post-trial proceedings.	6/2018
06/16/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	0.00	0.00	0	Unbilled	Return travel from Charlottesville, VA to home.	6/2018
06/19/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0.00	0	Unbilled	Email communications with Compliance Monitor N. Schaff, M.D., regarding post-trial status and next steps pending Court's resolution of Contempt Motion.	7/2018
06/20/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0.00	0	Unbilled	Participation in conference call of all counsel with Judge Moon's client, C. Julian, regarding proposals for post-trial briefing format and schedule (8:00); participation in conference call of Plaintiff's Litigation Team for trial debriefing (7:00).	7/2018
06/21/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0.00	0	Unbilled	Telephone conference with LAJC co-counsel A. Croff regarding confirmation of proposed format and schedule for post-trial briefing.	7/2018
06/22/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0.00	0	Unbilled	Final editing of and revisions to draft of Closing Argument prepared for presentation at conclusion of bench trial on Plaintiff's Motion for Contempt and transmission of same to co-counsel for use as outline of Post-Trial Brief.	7/2018
06/24/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0.00	0	Unbilled	Identification and forwarding of outstanding Veritek Court Reporting invoices for processing and payment.	7/2018
06/25/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0.00	0	Unbilled	Attention to outstanding court reporter and expert witness invoices for services rendered (1:50); email communications with co-counsel regarding procurement of copies of missing filings to complete Pleadings File (1:50).	7/2018
06/27/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0.00	0	Unbilled	Email communications with opposing counsel N. Schneider regarding proposed resolution of payment issues for services of parties' respective experts.	7/2018
07/05/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0.00	0	Unbilled	Email communications with Compliance Monitor N. Schaff, M.D., regarding status with respect to Court's resolution of Plaintiff's Contempt Motion.	7/2018
07/10/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0.00	0	Unbilled	Email communications with Court Reporters regarding arrangements concerning payments for services rendered in preparation of Trial Transcripts.	7/2018
07/11/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	0.00	0.00	0	Unbilled	Email communications with Court-approved Compliance Monitor N. Schaff, M.D., regarding arrangements for payment of expenses for appearance at deposition by Plaintiff.	7/2018
07/13/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	0.00	0.00	0	Unbilled	Email communications with co-counsel S. Ellis and Compliance Monitor N. Schaff regarding emergent medical situation involving plaintiff M. Ryder.	7/2018
07/23/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0.00	0	Unbilled	E-c correspondence with court reporters to resolve issues relating to preparation of trial transcripts (1:00); email communications with co-counsel A. Croff regarding next steps relating to preparation of Plaintiff's Post-Trial submissions (1:50).	8/2018
07/24/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	0.00	0.00	0	Unbilled	Initial review and editing of Plaintiff's draft Proposed Findings of Fact.	8/2018
07/25/2018		3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	0.00	0.00	0	Unbilled	Continued review and editing of initial draft of Plaintiff's Proposed Findings of Fact (2:00); work on outlining of Plaintiff's Proposed Conclusions of Law (1:00); email communications with co-counsel re addressing transcription errors by Court Reporters in preparation and submission of trial transcripts (1:50); email communications with co-counsel at LAJC regarding reports of deficient health care and premature deaths at Virginia Correctional Ctr. for Women in Goodland, VA and whether we can assist with addressing same (1:00).	8/2018
07/26/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	0.00	0.00	0	Unbilled	Editing of and revisions to draft of Plaintiff's Proposed Findings of Fact and draft e-memo to co-counsel providing comments and suggestions.	8/2018

Date	SWTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
07/27/2018		3747	Howard, Theodore	10010	Partner	0	2.50	1,937.50	775.00	2.50	0.00	0.00	08000		0	Unbilled	regarding file-checking project with respect to Plaintiffs' Proposed Findings of Fact (1.00); continued work on Plaintiffs' Proposed Conclusions of Law (1.50).	8/2018
07/28/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Continued work on drafting of Plaintiffs' Proposed Conclusions of Law.	8/2018
07/29/2018		3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000		0	Unbilled	Continued work on drafting of Plaintiffs' Proposed Conclusions of Law and editing of and revisions to first draft of same.	8/2018
07/30/2018		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Completed first draft of Plaintiffs' Proposed Conclusions of Law, editing of and revisions to same and transmittal of draft to co-counsel for review and comment.	8/2018
07/31/2018		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000		0	Unbilled	Editing of and revisions to drafts of Plaintiffs' Proposed Findings of Fact and Proposed Conclusions of Law and email communications with co-counsel regarding same (5.50); draft email to opposing counsel concerning proposed extension of time for filing of Parties' Post-Trial submissions (30).	8/2018
08/01/2018		3747	Howard, Theodore	10010	Partner	0	7.00	5,425.00	775.00	7.00	0.00	0.00	08000		0	Unbilled	Editing of and revisions to draft of Plaintiffs' Proposed Conclusions of Law and circulation of revised draft to all co-counsel for review and comment (4.50); editing of and revisions to revised draft of Plaintiffs' Proposed Findings of Fact (1.00); began work on drafting of Plaintiffs' Post-Trial Brief (1.50).	8/2018
08/02/2018		3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Preparation and filing of Consent Motion for Extension of Time and email communications with Judge Moon's Chambers regarding same (1.50); continued and completed work on initial draft of Plaintiffs' Post-Trial Brief and circulation of same to co-counsel (2.50).	8/2018
08/03/2018		3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Telephone and email communications with co-counsel A. Clouti regarding status of preparation of Plaintiffs' Post-Trial filings and next steps.	8/2018
08/05/2018		3747	Howard, Theodore	10010	Partner	0	6.00	4,650.00	775.00	6.00	0.00	0.00	08000		0	Unbilled	Continued work on editing of and revisions to Plaintiffs' Proposed Findings of Fact, Proposed Conclusions of Law and Post-Trial Brief and email communications with co-counsel concerning same.	8/2018
08/06/2018		3747	Howard, Theodore	10010	Partner	0	9.00	6,975.00	775.00	9.00	0.00	0.00	08000		0	Unbilled	Final editing of and revisions to Plaintiffs' Proposed Findings of Fact, Conclusions of Law and Post-Trial Brief, emails with co-counsel regarding same and work with Legal Asst. E. While on final preparation of all submissions and filing of same.	8/2018
08/07/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Initial review and analysis of Defendants' Post-Trial Brief and telephone conference with co-counsel A. Clouti and email communications with other co-counsel regarding same (2.50); conference with Legal Asst. E. While regarding preparation of case notebooks for cases cited in Defendants' Post-Trial Brief and aggregation of Plaintiffs' Trial Exhibits cited in Plaintiffs' Proposed Findings of Fact for purposes of transmission to Judge Moon's Chambers (1.00).	8/2018
08/08/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Draft transmittal letter to Judge Moon's chambers and assist Legal Asst. E. While with preparation and transmittal of courtesy copies of Proposed Findings of Fact, supporting admitted Trial Exhibits, Proposed Conclusions of Law and Post-Trial Brief (2.00); email communications with co-counsel regarding proposed strategy for responding to jurisdictional argument for denial of contempt presented in Defendants' Post-Trial Brief (1.00).	8/2018
08/10/2018		3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Preparation and participation in telephone conference with co-counsel regarding approach to responding to Defendants' Post-Trial Brief and jurisdictional argument set forth therein.	8/2018
08/12/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,325.00	775.00	3.00	0.00	0.00	08000		0	Unbilled	Legal research and analysis of case authorities relevant to VDOC's jurisdictional challenge to authority of the Court to render a finding of contempt under Rule 65(d), Fed. R. Civ. P., and draft email to co-counsel regarding same.	8/2018
08/14/2018		3747	Howard, Theodore	10010	Partner	0	3.50	2,712.50	775.00	3.50	0.00	0.00	08000		0	Unbilled	Telephone conference with co-counsel regarding proposed strategy for responding to VDOC's contention that Court lacks jurisdiction to award findings of civil contempt due to failure to comply with requirements of Rule 65(d) concerning injunctive relief (1.50); began work on drafting of Plaintiffs' Post-Trial Response Brief (2.00).	8/2018
08/15/2018		3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000		0	Unbilled	Continued work on draft of Plaintiffs' Post-Trial Response Brief and email communications with co-counsel regarding same.	8/2018

Date	SMTask	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
08/16/2018	3747	Howard, Theodore	10010	Partner	0	6.00	4,860.00	775.00	6.00	0.00	0.00	08000		0	Unbilled	Continued drafting of Plaintiff's Post-Trial Response Brief, legal research for same concerning Fed. R. Civ. P. 65(d) issues, and email communications with co-counsel regarding same.	8/20/18
08/17/2018	3747	Howard, Theodore	10010	Partner	0	6.50	5,037.50	775.00	6.50	0.00	0.00	08000		0	Unbilled	Continued drafting of Plaintiff's Post-Trial Response Brief, review and analysis of relevant case authorities for same, and email communications with co-counsel regarding same.	8/20/18
08/18/2018	3747	Howard, Theodore	10010	Partner	0	4.00	3,100.00	775.00	4.00	0.00	0.00	08000		0	Unbilled	Continued drafting of Plaintiff's Post-Trial Response Brief.	8/20/18
08/19/2018	3747	Howard, Theodore	10010	Partner	0	5.00	3,875.00	775.00	5.00	0.00	0.00	08000		0	Unbilled	Continued and completed draft of Plaintiff's Post-Trial Response Brief, editing of and revisions to same, and draft transmittal e-memo to co-counsel forwarding draft for review and comment.	8/20/18
08/20/2018	3747	Howard, Theodore	10010	Partner	0	7.50	5,812.50	775.00	7.50	0.00	0.00	08000		0	Unbilled	Completed revised draft of Plaintiff's Post-Trial Response Brief based on comments and suggestions received from co-counsel (4.50); final editing of and revisions to same (2.0); preparation for and assisting with e-filing of same (5.0).	9/20/18
08/23/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email and telephone communications with co-counsel regarding status.	9/20/18
08/29/2018	3747	Howard, Theodore	10010	Partner	0	2.00	1,550.00	775.00	2.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding emerging medical situation involving class member A, Nichols and proposed communication to FCCW Medical Director regarding same (5.0); review of notes prepared by co-counsel S. Ellis summarizing initial meeting with new FCCW Medical Director P. Targonski (5.0); email communications with co-counsel regarding provision of Plaintiff's consolidated comments with respect to current draft report of Compliance Monitor N. Schaff, M.D. (1.00).	9/20/18
08/31/2018	3747	Howard, Theodore	10010	Partner	0	4.50	3,487.50	775.00	4.50	0.00	0.00	08000		0	Unbilled	Review of consolidated comments from co-counsel on Compliance Monitor N. Schaff, M.D.'s draft of current monitoring report and synthesizing of same into Memo to Dr. Schaff and transmittal of same to Dr. Schaff (4.00); telephone conference with opposing counsel E. McNelis regarding proposal for pursuing negotiated resolution of Plaintiff's attorneys' fees claim associated with civil contempt proceedings and draft email to co-counsel regarding same (5.0).	9/20/18
09/04/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Email communications with legal Aid Justice co-counsel A. Claff regarding quantification of attorneys' fees and costs incurred by Plaintiff in prosecuting civil contempt action.	9/20/18
09/06/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel A. Claff regarding quantification of attorneys' fees and litigation expenses incurred in contempt phase for purposes of possible negotiation of resolution with Defendants and request to B. Matto of Accounting Department for information relating to same.	9/20/18
09/18/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Review and analysis of firm time and expense records information in connection with Defendants' invitation to resolve attorneys' fees and costs issue by negotiation.	10/20/18
09/19/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Drafting e-memo to co-counsel providing aggregate attorneys' fees and litigation costs information for purposes of inclusion in development of settlement proposal to Defendants.	10/20/18
09/20/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding attorneys' fees discounting calculations for purposes of formulation of settlement proposal to Defendants.	10/20/18
09/21/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Drafting and transmittal of e-memo to Defendants' counsel conveying Plaintiff's opening offer to settle attorneys' fees and costs claim relating to Contempt Phase of litigation.	10/20/18
09/23/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding VWR inputs to fee-cost settlement proposal prepared for submission to Defendants' counsel and revisions to same.	10/20/18
09/24/2018	3747	Howard, Theodore	10010	Partner	0	1.00	775.00	775.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel regarding revisions to draft of proposed offer to Defendants' counsel to resolve Contempt Phase attorneys' fees and costs.	10/20/18
10/04/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Initial review of VDOC/Armore Mortality Review Report for deceased FCCW prisoner C. Masfield and forwarding copy of same to co-counsel.	10/20/18
11/06/2018	3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000		0	Unbilled	Receipt from FCCW and transmittal to co-counsel of initial VDOC/Armore incident reports concerning death of FCCW inmate M. Crawford.	12/20/18

Time Report
 Billed and Unbilled
 Washington Lawyers Committee for Civil / Fluoride Medical Care Class Action (75159-21)

Date	SMTask	Attorney Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
11/09/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Receipt from FCCW, initial review, and transmittal to co-counsel of VDOC's revised Mortality Review concerning death of FCCW inmate K. Maness (1.00); draft email to opposing counsel E. McNelis to follow up on Plaintiffs' "highlow" proposal to resolve attorneys' fees issue in Contempt Phase on negotiated basis and email exchange with LAJC co-counsel A. Croft regarding same (50).	12/2018
11/20/2018		3747	Howard, Theodore	10010	Partner	0	1.50	1,162.50	775.00	1.50	0.00	0.00	08000	0	Unbilled	Initial review and analysis of draft Report of Compliance Monitor N. Scharf, M.D., regarding most recent monitoring visit at FCCW (1.00); follow-up with co-counsel regarding detailed receipt of FDOC/Amor Mortality Review concerning death of FCCW inmate M. Crawford and transmittal of review to co-counsel (50).	12/2018
11/30/2018		3747	Howard, Theodore	10010	Partner	0	0.50	387.50	775.00	0.50	0.00	0.00	08000	0	Unbilled	Investigation regarding status of unpaid invoice of Plaintiffs' expert J. Clark.	12/2018
12/10/2018		3747	Howard, Theodore	10010	Partner	0	3.00	2,505.00	835.00	3.00	0.00	0.00	08000	0	Unbilled	Work on incorporation of revisions suggested by co-counsel to draft Monitoring Report of N. Scharf, M.D. for November 2018 monitoring visit to FCCW, editing of and revisions to same, and transmittal of final version to Dr. Scharf.	3/2019
12/11/2018		3747	Howard, Theodore	10010	Partner	0	1.00	835.00	835.00	1.00	0.00	0.00	08000	0	Unbilled	Follow up email communications with Compliance Monitor N. Scharf, M.D., regarding matters addressed in Plaintiffs' consolidated comments on draft Monitoring Report regarding Nov. 2018 visit to FCCW.	3/2019
12/20/2018		3747	Howard, Theodore	10010	Partner	0	0.50	417.50	835.00	0.50	0.00	0.00	08000	0	Unbilled	Communications with Assistant U. Pleincha and Accounting Department regarding payment to Plaintiffs' expert witness J. Clark.	3/2019
01/02/2019		3747	Howard, Theodore	10010	Partner	0	4.00	3,600.00	900.00	4.00	0.00	0.00	08000	0	Unbilled	Preparation for and participation in telephone conference with co-counsel B. Castaneds and S. Ellis to discuss planning for possible appeal (1.00); initial review and analysis of Court's Findings of Fact and Conclusion of Law resolving Contempt Phase and email communications with co-counsel regarding same (3.00).	3/2019
01/03/2019		3747	Howard, Theodore	10010	Partner	0	2.50	2,250.00	900.00	2.50	0.00	0.00	08000	0	Unbilled	Continued initial review and analysis of Court's Findings of Fact and Conclusions of Law resolving Contempt Phase (1.00); participation in telephone conference of all Plaintiffs' counsel regarding Court's decision and next steps (1.50).	3/2019
01/04/2019		3747	Howard, Theodore	10010	Partner	0	2.50	2,250.00	900.00	2.50	0.00	0.00	08000	0	Unbilled	Email communications with co-counsel regarding issues as to which Plaintiffs might wish to seek reconsideration of Court's Contempt Phase rulings (1.50); draft e-memo to LAJC volunteer co-counsel T. Ball regarding Prison Litigation Reform Act concerns with Court's decision (1.00).	3/2019
01/09/2019		3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000	0	Unbilled	Telephone conference with co-counsel S. Ellis regarding efforts to contact opposing counsel E. McNelis to discuss Defendant VDOC's plans for addressing Court's Contempt Phase decision.	3/2019
01/10/2019		3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	08000	0	Unbilled	Participation in telephone conference of Plaintiffs' Litigation Team regarding flagging and development of issues for Motion for Reconsideration of Court's Contempt Phase decision and draft research request to Firm Library Research Team regarding same.	3/2019
01/12/2019		3747	Howard, Theodore	10010	Partner	0	2.00	1,800.00	900.00	2.00	0.00	0.00	08000	0	Unbilled	Work on drafting of Memorandum in Support of Plaintiffs' Petition for Attorneys' Fees and Costs (1.50); email exchange with co-counsel regarding applicable measurement period for fee request (50).	3/2019
01/15/2019		3747	Howard, Theodore	10010	Partner	0	2.50	2,250.00	900.00	2.50	0.00	0.00	08000	0	Unbilled	Review and analysis of cases yielded by Library Research Staff concerning updating of Fourth Circuit jurisprudence since early 2016 addressing attorneys' fees awards (2.00); email communications with co-counsel concerning proposed strategic approach to preparation of Fee Petition (50).	3/2019
01/17/2019		3747	Howard, Theodore	10010	Partner	0	4.00	3,600.00	900.00	4.00	0.00	0.00	08000	0	Unbilled	Conference call with co-counsel regarding draft of Rule 59(e) Motion for Reconsideration with respect to Court's Injunction Order (1.00); email communications with opposing counsel E. McNelis regarding Plaintiffs' prospective Motion for Extension of Time to File Attorneys' Fees Petition (50); email communications with WLC volunteer attorney T. Ball concerning PIRA compliance issues potentially presented by Court's Findings. Conclusions and Injunction Order (1.00); continued work on Memorandum in Support of Plaintiffs' Fee Petition (1.50).	3/2019

Date	SMTask	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
01/18/2019		Howard, Theodore	10010	Partner	0	4.50	4,050.00	900.00	4.50	0.00	0.00	08000		0	Unbilled	Drafting and submission of Motion to Extend Time to File Attorney's Fees Petition and communications with co-counsel and opposing counsel E. McNeils regarding same (3.00); continued work on drafting of Memorandum in Support of Petition for Attorney's Fees (1.00); email communications with co-counsel regarding Court-ordered submission of Motion for Substitution of Parties concerning identity of current FCCW Medical Director, Dr. P. Torpinski (.50).	3/2019
01/21/2019		Howard, Theodore	10010	Partner	0	3.00	2,700.00	900.00	3.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel concerning Fee Petition supporting legal analysis (1.00); continued work on preparation of Memorandum of Law in Support of Plaintiff's Fee Petition (2.00).	3/2019
01/22/2019		Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Communications with Chambers of Mag. Judge J. Hoppe concerning Plaintiff's pending Motion to Extend Time to File Fee Petition, and updating of co-counsel regarding same.	3/2019
01/23/2019		Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel S. Ellis regarding drafts of Declarations prepared to support Plaintiff's Fee Petition (1.00); review of legal research findings provided by K. Swardcoe addressing scope of breach of Settlement Agreement remedies available to the Court under Virginia common law and transmittal email to co-counsel regarding same (.50).	3/2019
01/24/2019		Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Preparation for and participation in call with Plaintiff's Litigation Team regarding status of preparation of Plaintiff's Motion for Reconsideration with respect to certain aspects of Court's Injunction Order and proposed next steps.	3/2019
01/26/2019		Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel A. Turner and Court-appointed Compliance Monitor N. Scharff, M.D., concerning status of parties' efforts to develop an Americans with Disabilities Act policy for FCCW.	3/2019
01/27/2019		Howard, Theodore	10010	Partner	0	4.50	4,050.00	900.00	4.50	0.00	0.00	08000		0	Unbilled	Editing of and revisions to Plaintiff's Rule 59 Motion for Reconsideration with respect to certain elements of the Court's Injunction Order, drafting of Section of Supporting Memorandum to explain need for inclusion of Settlement Agreement with revised Injunction Order pursuant to Rule 65(d), and emails with co-counsel regarding same (3.50); draft e-memo to Compliance Monitor N. Scharff, M.D., concerning status of parties' efforts to resolve differences concerning Americans With Disabilities Act operating procedure (1.00).	3/2019
01/28/2019		Howard, Theodore	10010	Partner	0	3.00	2,700.00	900.00	3.00	0.00	0.00	08000		0	Unbilled	Email communications with Plaintiff's correctional medical expert R. Greifinger, M.D., regarding nursing staffing issue arising in connection with Rule 59 Motion for Reconsideration of Injunction Order (1.00); final editing of and revisions to Plaintiff's Motion for Reconsideration and communications with co-counsel regarding same (2.00).	3/2019
01/29/2019		Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	08000		0	Unbilled	Final review and editing of revised drafts of Plaintiff's Rule 59 Motion for Reconsideration, supporting Memorandum and Proposed Order and follow-up email communications with co-counsel regarding same.	3/2019
01/30/2019		Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Communications with co-counsel regarding final revisions to Rule 59 Motion for Reconsideration (.50); initial review and analysis of Defendants Rule 59 filing (.50).	3/2019
01/31/2019		Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Participation in conference call of Plaintiff's Litigation Team regarding review of Defendants' Rule 59 Motion and identification of arguments responsive to points raised and argued therein.	3/2019
02/01/2019		Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	08000		0	Unbilled	Review of draft e-memo to opposing counsel inviting participation in discussions to resolve Contempt Phase attorneys' fees and provision of comments to co-counsel.	4/2019
02/08/2019		Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000		0	Unbilled	Email communication with co-counsel S. Ellis regarding receipt from FCCW of initial reports concerning the death of FCCW prisoner S. Dixon.	4/2019
02/11/2019		Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Initial review and editing of draft of Plaintiff's Memorandum in Opposition to VDOC Defendants' Rule 59 Motion to Alter or Amend Judgment and email communications with co-counsel S. Ellis regarding same.	4/2019

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02/13/2019		Howard, Theodore	10010	Partner	0	3.00	2,700.00	900.00	3.00	0.00	0.00	080000		0	Unbilled	Final editing and revisions to Plaintiff's Opposition to Defendant's Rule 59 Motion to Alter/Amend Judgment and email communications with co-counsel S. Ellis regarding same (1.00); initial review of Defendants' Opposition to Plaintiff's Rule 59 Motion and email communications with co-counsel regarding same (1.00); review of emails exchanged between the parties concerning medical care issues of FCCW prisoner M. Ryder (1.00).	4/2019
02/14/2019	3747	Howard, Theodore	10010	Partner	0	3.00	2,700.00	900.00	3.00	0.00	0.00	080000		0	Unbilled	Telephone conference with co-counsel to discuss arguments for inclusion in Plaintiff's Reply to Defendants' Opposition to Plaintiff's Rule 59 Motion (50); resumed work on drafting of Memorandum in Support of Plaintiff's Petition for Attorneys' Fees and related legal research (2.50).	4/2019
02/15/2019	3747	Howard, Theodore	10010	Partner	0	6.00	5,400.00	900.00	6.00	0.00	0.00	080000		0	Unbilled	Continued drafting of Memorandum of Support of Plaintiff's Petition for Attorneys' Fees and related review and analysis of relevant case law.	4/2019
02/18/2019	3747	Howard, Theodore	10010	Partner	0	2.50	2,250.00	900.00	2.50	0.00	0.00	080000		0	Unbilled	Review and analysis of correspondence from Defendants' counsel to Court-appointed Compliance Monitor N. Schaff, M.D., with attached documents reflecting status of Defendants' alleged compliance with provisions of the Court's Injunction Order and email communications with co-counsel and Plaintiff's medical expert R. Greifinger, M.D., regarding same.	4/2019
02/20/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	080000		0	Unbilled	Final review of draft of Plaintiff's Reply Memorandum in support of their Rule 59 Motion and email communications with co-counsel S. Ellis regarding same.	4/2019
02/21/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	080000		0	Unbilled	Transmission to co-counsel S. Ellis of documents received from FCCW concerning death of prisoner S. Dixon (.50); email communications with co-counsel S. Ellis regarding comments on proposed draft letter to VDOC addressing emergency medical care needs of FCCW prisoner M. Ryder (.50).	4/2019
02/22/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	080000		0	Unbilled	Editing of and revisions to revised draft letter to VDOC concerning emergency medical care needs of FCCW prisoner M. Ryder and email communications with co-counsel S. Ellis regarding same.	4/2019
03/04/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	080000		0	Unbilled	Telephone conference with Plaintiff's medical expert R. Greifinger, M.D., concerning contact by Virginia news reporter seeking comment on general state of medical care in VA Dept. of Corrections women's facilities.	5/2019
03/06/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	080000		0	Unbilled	Email communications with co-counsel regarding urgent medical care issues of FCCW prisoner M. Ryder and communications with Attorney General's Office concerning same.	5/2019
03/08/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	080000		0	Unbilled	Email communications with co-counsel regarding next steps in addressing medical care issues concerning Plaintiff M. Ryder.	5/2019
03/12/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	080000		0	Unbilled	Email communications with co-counsel S. Ellis regarding proposed edits and revisions to the draft Declaration of Plaintiff M. Ryder.	5/2019
03/14/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	080000		0	Unbilled	Email communications with co-counsel S. Ellis concerning strategy for moving forward with possible Emergency Motion regarding FCCW's deficient medical care with respect to Plaintiff M. Ryder.	5/2019
03/16/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	080000		0	Unbilled	Email communications with co-counsel concerning strategy for moving forward with respect to emergency medical care claims on behalf of Plaintiff M. Ryder.	5/2019
03/19/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	080000		0	Unbilled	Email communications with co-counsel regarding proposed emergency motion involving FCCW's failure to provide life-sustaining medication and medical care to Plaintiff W. Ryder.	5/2019
03/20/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	080000		0	Unbilled	Email communications with co-counsel S. Ellis regarding timing issues with respect to FCCW's transmission of Mortality Review for deceased FCCW prisoner S. Dixon and follow up communications with VDOC's counsel regarding same.	5/2019
03/22/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	080000		0	Unbilled	Review of FCCW "medical report" concerning treatment status of Plaintiff M. Ryder and email communications with co-counsel S. Ellis concerning proposed next steps.	5/2019
03/29/2019	3747	Howard, Theodore	10010	Partner	0	2.00	1,800.00	900.00	2.00	0.00	0.00	080000		0	Unbilled	Review and editing of revised draft of Emergency Motion papers concerning the urgent medical care needs of Plaintiff M. Ryder and email communications with co-counsel S. Ellis regarding same.	5/2019
04/02/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	080000		0	Unbilled	Email communications with co-counsel regarding suggested revisions to revised draft of Emergency Motion papers addressing urgent medical care needs to Plaintiff M. Ryder.	5/2019

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04/04/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Telephone conference and email communications with co-counsel S. Ellis regarding proposed motion on behalf of FCCW prisoner M. Ryder and proposed next steps.	5/2019
04/19/2019	3747	Howard, Theodore	10010	Partner	0	2.00	1,800.00	900.00	2.00	0.00	0.00	08000		0	Unbilled	Review and analysis of current draft of motion papers concerning Plaintiff M. Ryder's urgent medical care needs and email communications with co-counsel S. Ellis regarding same.	6/2019
04/25/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel S. Ellis regarding revised drafts of motion papers concerning Plaintiff M. Ryder and proposed next steps regarding same.	6/2019
04/26/2019	3747	Howard, Theodore	10010	Partner	0	1.50	1,350.00	900.00	1.50	0.00	0.00	08000		0	Unbilled	Edits and revisions to revised drafts of motion papers concerning Plaintiff M. Ryder and email communications with co-counsel S. Ellis regarding same.	6/2019
04/29/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Review of draft Press Release concerning filing of emergency motion on behalf of Plaintiff M. Ryder and email communications with co-counsel S. Ellis regarding same.	6/2019
04/30/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000		0	Unbilled	Email communications with co-counsel concerning Defendants' position on scheduling of hearing on M. Ryder emergency motion.	6/2019
05/02/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000		0	Unbilled	Exchange of phone messages with opposing counsel V. Pearson of V.A.G.'s Office concerning possible global settlement decisions.	6/2019
05/03/2019	3747	Howard, Theodore	10010	Partner	0	1.00	900.00	900.00	1.00	0.00	0.00	08000		0	Unbilled	Telephone conference with V. Pearson of VA Attorney General's Office regarding possible reassessment of the case for settlement purposes, suggested next steps, and email communications with co-counsel regarding same.	6/2019
05/06/2019	3747	Howard, Theodore	10010	Partner	0	0.50	450.00	900.00	0.50	0.00	0.00	08000		0	Unbilled	Email to co-counsel B. Castaneda and S. Ellis concerning VA Attorney General's Office's stated renewed interest in exploring settlement and strategy responding to same.	6/2019
05/05/2017	4600	Jasper-Booker, Whitetown	20210	Legal Assistant	0	4.00	1,100.00	275.00	4.00	0.00	0.00	08000		0	Unbilled	Review and analyze Memorandum of Law in Support of Plaintiff's Motion for Order to Show Cause Why Defendants Should not be held in contempt.	9/2017
06/13/2017	5390	Lynn, Hannah	20410	Project Assistant	0	4.25	892.50	210.00	4.25	0.00	0.00	08000		0	Unbilled	Meeting with R. Williams and T. Howard re Fluorana and begin Fluorana medical document review against medical files per this request.	7/2017
06/14/2017	5390	Lynn, Hannah	20410	Project Assistant	0	2.25	472.50	210.00	2.25	0.00	0.00	08000		0	Unbilled	Continue Fluorana medical document review against medical files per T. Howard's request.	7/2017
06/19/2017	5390	Lynn, Hannah	20410	Project Assistant	0	2.75	577.50	210.00	2.75	0.00	0.00	08000		0	Unbilled	Continue Fluorana medical document review against medical files per T. Howard's request.	7/2017
06/20/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.50	315.00	210.00	1.50	0.00	0.00	08000		0	Unbilled	Continue Fluorana medical document review against medical files per T. Howard's request.	7/2017
06/21/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.75	367.50	210.00	1.75	0.00	0.00	08000		0	Unbilled	Continue Fluorana medical document review against medical files per T. Howard's request.	7/2017
06/22/2017	5390	Lynn, Hannah	20410	Project Assistant	0	0.75	157.50	210.00	0.75	0.00	0.00	08000		0	Unbilled	Continue Fluorana medical document review against medical files per T. Howard's request.	7/2017
06/23/2017	5390	Lynn, Hannah	20410	Project Assistant	0	5.75	1,207.50	210.00	5.75	0.00	0.00	08000		0	Unbilled	Continue Fluorana medical document review against medical files per T. Howard's request.	7/2017
06/25/2017	5390	Lynn, Hannah	20410	Project Assistant	0	4.00	840.00	210.00	4.00	0.00	0.00	08000		0	Unbilled	Continue Fluorana medical document review against medical files per T. Howard's request.	7/2017
06/26/2017	5390	Lynn, Hannah	20410	Project Assistant	0	5.75	1,207.50	210.00	5.75	0.00	0.00	08000		0	Unbilled	Continue Fluorana medical document review against medical files per T. Howard's request.	7/2017
06/27/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.25	282.50	210.00	1.25	0.00	0.00	08000		0	Unbilled	Continue Fluorana medical document review against medical files per T. Howard's request.	7/2017
07/06/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.75	367.50	210.00	1.75	0.00	0.00	08000		0	Unbilled	Continue to compare declarations against medical records per T. Howard's request.	7/2017
07/13/2017	5390	Lynn, Hannah	20410	Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	08000		0	Unbilled	Review Declarations and Medical records per T. Howard's request.	7/2017
07/14/2017	5390	Lynn, Hannah	20410	Project Assistant	0	1.00	210.00	210.00	1.00	0.00	0.00	08000		0	Unbilled	Continue review of medical records and declarations per T. Howard's request.	7/2017
07/18/2018	5390	Lynn, Hannah	20410	Project Assistant	0	1.25	262.50	210.00	1.25	0.00	0.00	08000		0	Unbilled	Attend conference call regarding Relativity Training in preparation for document Production review with P. Mitchell, T. Howard, and R. Williams.	1/2018
07/26/2018	5390	Lynn, Hannah	20410	Project Assistant	0	2.25	472.50	210.00	2.25	0.00	0.00	08000		0	Unbilled	Review VUA and VCU subpoenas does tecum and attached medical releases and client list per T. Howard's request.	1/2018
07/26/2018	5390	Lynn, Hannah	20410	Project Assistant	0	0.50	105.00	210.00	0.50	0.00	0.00	08000		0	Unbilled	Confer with R. Williams re assignments from Justice for All per T. Brown's request.	1/2018
07/29/2018	5390	Lynn, Hannah	20410	Project Assistant	0	2.50	525.00	210.00	2.50	0.00	0.00	08000		0	Unbilled	Review local court rules for subpoenas, review medical release forms for each inmate, and begin compiling subpoenas per T. Howard's request.	1/2018
07/30/2018	5390	Lynn, Hannah	20410	Project Assistant	0	4.50	945.00	210.00	4.50	0.00	0.00	08000		0	Unbilled	Prepare subpoenas for inmate medical records for VUA and VCU hospitals and organize services per T. Howard's request.	1/2018

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02/06/2018	5390	Lynn, Hannah	20410	Project Assistant	0	5.75	1,207.50	210.00	5.75	0.00	0.00	08000		0	Unbilled	Begin production requests and objections summary per T. Howard's request.	2/2018
02/07/2018	5390	Lynn, Hannah	20410	Project Assistant	0	5.00	1,050.00	210.00	5.00	0.00	0.00	08000		0	Unbilled	Continue production requests and objections summary per T. Howard's request.	2/2018
02/08/2018	5390	Lynn, Hannah	20410	Project Assistant	0	4.50	945.00	210.00	4.50	0.00	0.00	08000		0	Unbilled	Continue production requests and objections summary per T. Howard's request.	2/2018
02/09/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	08000		0	Unbilled	Finalize Production Requests and Objections summary per T. Howard's request.	2/2018
02/12/2018	5390	Lynn, Hannah	20410	Project Assistant	0	0.50	105.00	210.00	0.50	0.00	0.00	08000		0	Unbilled	Email correspondence with S. Ellis re Henrick deposition preparation.	2/2018
02/12/2018	5390	Lynn, Hannah	20410	Project Assistant	0	2.50	525.00	210.00	2.50	0.00	0.00	08000		0	Unbilled	Make further edits to productions requests and objections summary and send to S. Ellis.	2/2018
02/14/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	08000		0	Unbilled	Pull and log files from relativity for Henrick deposition per T. Howard's request.	2/2018
02/15/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	08000		0	Unbilled	Pull additional files from relativity, and organize in file folders for preparation for Henrick deposition, organize CVs per T. Howard's request.	2/2018
02/27/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.00	630.00	210.00	3.00	0.00	0.00	08000		0	Unbilled	Prepare VCU and VVA subpoenas per T. Howard's request. Follow up with VCU regarding Subpoenas issued on 1/31 per T. Howard's request.	3/2018
03/01/2018	5390	Lynn, Hannah	20410	Project Assistant	0	1.00	210.00	210.00	1.00	0.00	0.00	08000		0	Unbilled	Scan and download medical records, follow up regarding canceled medical authorization requests and resend authorizations; find W2 information for services of subpoenas; locate produced files per T. Howard's request.	3/2018
03/20/2018	5390	Lynn, Hannah	20410	Project Assistant	0	6.50	1,365.00	210.00	6.50	0.00	0.00	08000		0	Unbilled	Assist T. Howard with filing per his request; pull produced documents sighted in expert reports and send to co-counsel for distribution to opposing counsel.	3/2018
03/23/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	08000		0	Unbilled	Begin to process production request per T. Howard's request.	4/2018
03/27/2018	5390	Lynn, Hannah	20410	Project Assistant	0	6.00	1,260.00	210.00	6.00	0.00	0.00	08000		0	Unbilled	Continue to process production request per T. Howard's request.	4/2018
03/28/2018	5390	Lynn, Hannah	20410	Project Assistant	0	6.00	1,260.00	210.00	6.00	0.00	0.00	08000		0	Unbilled	Continue to process production request per T. Howard's request.	4/2018
03/29/2018	5390	Lynn, Hannah	20410	Project Assistant	0	4.00	840.00	210.00	4.00	0.00	0.00	08000		0	Unbilled	Continue to process production request per T. Howard's request.	4/2018
03/30/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.00	630.00	210.00	3.00	0.00	0.00	08000		0	Unbilled	Continue to process production request per T. Howard's request.	4/2018
04/02/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.00	630.00	210.00	3.00	0.00	0.00	08000		0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request; and process check requests for release of final medical records from VDOC.	5/2018
04/03/2018	5390	Lynn, Hannah	20410	Project Assistant	0	2.00	420.00	210.00	2.00	0.00	0.00	08000		0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request.	5/2018
04/04/2018	5390	Lynn, Hannah	20410	Project Assistant	0	2.00	420.00	210.00	2.00	0.00	0.00	08000		0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request.	5/2018
04/05/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.00	630.00	210.00	3.00	0.00	0.00	08000		0	Unbilled	Continue review of discovery documents for production per T. Howard's request.	4/2018
04/06/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	08000		0	Unbilled	Submit and process checks for payment to VDOC for medical records per T. Howard's request.	4/2018
04/09/2018	5390	Lynn, Hannah	20410	Project Assistant	0	6.00	1,260.00	210.00	6.00	0.00	0.00	08000		0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request.	5/2018
04/10/2018	5390	Lynn, Hannah	20410	Project Assistant	0	6.00	1,260.00	210.00	6.00	0.00	0.00	08000		0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request.	5/2018
04/11/2018	5390	Lynn, Hannah	20410	Project Assistant	0	11.00	2,310.00	210.00	11.00	0.00	0.00	08000		0	Unbilled	Continue review of 2nd RFP request for responsiveness and production per T. Howard's request.	5/2018
04/12/2018	5390	Lynn, Hannah	20410	Project Assistant	0	5.25	1,102.50	210.00	5.25	0.00	0.00	08000		0	Unbilled	Finish review of 2nd RFP request for responsiveness and production per T. Howard's request; coordinate production with P. Mitchell.	5/2018
04/13/2018	5390	Lynn, Hannah	20410	Project Assistant	0	6.75	1,417.50	210.00	6.75	0.00	0.00	08000		0	Unbilled	Create privilege log of unproduced documents per T. Howard's request.	5/2018
04/14/2018	5390	Lynn, Hannah	20410	Project Assistant	0	1.00	210.00	210.00	1.00	0.00	0.00	08000		0	Unbilled	Review and pull documents for T. Howard's review of privileged documents per his request.	5/2018
04/15/2018	5390	Lynn, Hannah	20410	Project Assistant	0	2.00	420.00	210.00	2.00	0.00	0.00	08000		0	Unbilled	Review and sort 3rd production documents for relevancy and privilege per T. Howard's request.	5/2018
04/16/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	08000		0	Unbilled	Prepare 3rd Production documents for approval, process invoice for VDOC records and check request for transmittal to VDOC, coordinate 3rd production with Paul, begin third production privilege log per T. Howard's request.	5/2018
04/17/2018	5390	Lynn, Hannah	20410	Project Assistant	0	1.50	315.00	210.00	1.50	0.00	0.00	08000		0	Unbilled	Draft invoice letter and organize attached invoices and respective checks and overnight mail to Fluvanna for medical records per T. Howard's request.	5/2018
04/18/2018	5390	Lynn, Hannah	20410	Project Assistant	0	3.25	682.50	210.00	3.25	0.00	0.00	08000		0	Unbilled	Catch up phone call with S. Ellis regarding invoice and check status for medical records, following phone call make priority list for organizing medical records acquisition and scheduling of document uploads; wait for RFP No. 4 and transmit to opposing counsel and co-counsel via secure send per T. Howard's request.	5/2018

Date	SMTask	Attorney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
04/20/2018		5390 Lynn, Hannah	20410	Project Assistant	0	3.50	735.00	210.00	3.50	0.00	0.00	08000		0	Unbilled	Create privilege log of 3rd production, and isolate and send documents withheld from 4th RFP to T. Howard for review per his request.	5/2018
04/24/2018		5390 Lynn, Hannah	20410	Project Assistant	0	4.50	945.00	210.00	4.50	0.00	0.00	08000		0	Unbilled	Chat with A. Clout while she is in office for Schaff deposition, stay late to send out supplemental production via secure send per T. Howard's request.	5/2018
04/25/2018		5390 Lynn, Hannah	20410	Project Assistant	0	4.00	840.00	210.00	4.00	0.00	0.00	08000		0	Unbilled	Finish privilege log and follow up with VDOC about medical records requests per T. Howard's request.	5/2018
04/26/2018		5390 Lynn, Hannah	20410	Project Assistant	0	3.00	630.00	210.00	3.00	0.00	0.00	08000		0	Unbilled	Review and sort inmate medical records in preparation for production per T. Howard's request.	5/2018
04/27/2018		5390 Lynn, Hannah	20410	Project Assistant	0	2.00	420.00	210.00	2.00	0.00	0.00	08000		0	Unbilled	Begin document filing of produced documents in preparation for response to defendants reply per T. Howard's request.	5/2018
05/01/2018		5390 Lynn, Hannah	20410	Project Assistant	0	1.50	315.00	210.00	1.50	0.00	0.00	08000		0	Unbilled	Continue naming files in excel document for LAJC review per T. Howard's request.	5/2018
05/02/2018		5390 Lynn, Hannah	20410	Project Assistant	0	4.50	945.00	210.00	4.50	0.00	0.00	08000		0	Unbilled	Continue naming files in excel sheet for review per LAJC's request per T. Howard's request.	5/2018
05/04/2018		5390 Lynn, Hannah	20410	Project Assistant	0	0.25	52.50	210.00	0.25	0.00	0.00	08000		0	Unbilled	Further coordinate Donna Reed Death Records and send relatively information to local counsel per T. Howard's request.	5/2018
05/07/2018		5390 Lynn, Hannah	20410	Project Assistant	0	1.75	367.50	210.00	1.75	0.00	0.00	08000		0	Unbilled	Process and send out checks for inmate medical records per T. Howard's request.	5/2018
05/16/2018		5390 Lynn, Hannah	20410	Project Assistant	0	6.50	1,365.00	210.00	6.50	0.00	0.00	08000		0	Unbilled	Fluvarina trial prep.	6/2018
05/18/2018		5390 Lynn, Hannah	20410	Project Assistant	0	6.00	1,260.00	210.00	6.00	0.00	0.00	08000		0	Unbilled	General preparations for trial, pulling files, etc.	6/2018
05/22/2018		5390 Lynn, Hannah	20410	Project Assistant	0	6.50	1,365.00	210.00	6.50	0.00	0.00	08000		0	Unbilled	General preparations for trial, pulling files, etc.	6/2018
05/23/2018		5390 Lynn, Hannah	20410	Project Assistant	0	6.00	1,260.00	210.00	6.00	0.00	0.00	08000		0	Unbilled	General preparations for trial, pulling files, etc.	6/2018
05/24/2018		5390 Lynn, Hannah	20410	Project Assistant	0	4.50	945.00	210.00	4.50	0.00	0.00	08000		0	Unbilled	Fluvarina trial prep.	6/2018
05/29/2018		5390 Lynn, Hannah	20410	Project Assistant	0	12.00	2,520.00	210.00	12.00	0.00	0.00	08000		0	Unbilled	Assist T. Howard with preparing and filing pretrial brief per his request.	6/2018
05/31/2018		5390 Lynn, Hannah	20410	Project Assistant	0	7.50	1,575.00	210.00	7.50	0.00	0.00	08000		0	Unbilled	Fluvarina trial prep.	6/2018
06/01/2018		5390 Lynn, Hannah	20410	Project Assistant	0	6.50	1,365.00	210.00	6.50	0.00	0.00	08000		0	Unbilled	General preparations for trial, pulling files, etc.	6/2018
06/04/2018		5390 Lynn, Hannah	20410	Project Assistant	0	6.50	1,365.00	210.00	6.50	0.00	0.00	08000		0	Unbilled	General preparations for trial, pulling files, etc.	6/2018
06/05/2018		5390 Lynn, Hannah	20410	Project Assistant	0	7.50	1,575.00	210.00	7.50	0.00	0.00	08000		0	Unbilled	General preparations for trial, pulling files, etc.	6/2018
06/06/2018		5390 Lynn, Hannah	20410	Project Assistant	0	4.50	945.00	210.00	4.50	0.00	0.00	08000		0	Unbilled	General preparations for trial, pulling files, etc.	6/2018
06/07/2018		5390 Lynn, Hannah	20410	Project Assistant	0	8.50	1,785.00	210.00	8.50	0.00	0.00	08000		0	Unbilled	General preparations for trial, pulling files, etc.	6/2018
06/08/2018		5390 Lynn, Hannah	20410	Project Assistant	0	8.75	1,837.50	210.00	8.75	0.00	0.00	08000		0	Unbilled	General preparations for trial, pulling files, etc.	6/2018
		Lynn, Hannah	Total			285.00	59,850.00		285.00	0.00	0.00						
12/18/2017		5693 Michel, Paul	20710	eDiscovery Specialist	0	1.50	487.50	325.00	1.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consulted with legal team on production spec and opposing counsel demands regarding same.	1/2018
12/20/2017		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, participated in conference call with legal team and opposing counsel. Prepared revised specs for productions based on call. Consulted with legal team on format for e-mail productions.	1/2017
12/21/2017		5693 Michel, Paul	20710	eDiscovery Specialist	0	1.50	487.50	325.00	1.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on production specifications.	1/2017
12/29/2017		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on production specifications. Prepare responses to opposing counsel's objections to proposed specifications.	1/2017
01/02/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors in the first production volume from opposing counsel, and remaining issues on production specifications.	1/2018
01/05/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	1.50	487.50	325.00	1.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team and producing party on errors on resolution of errors in opposing counsel production and new delivery.	1/2018
01/10/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review.	1/2018
01/11/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review. Examine production documents and provide report on same.	1/2018
01/12/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review.	1/2018
01/16/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review. Prepare report on production documents.	1/2018
01/18/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate and perform training for legal team on document review tools. Consult with legal team on document review.	1/2018
01/23/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same. Consult with producing party on production format.	1/2018
01/25/2018		5693 Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.	1/2018

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
01/26/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.	1/2018
01/29/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.	1/2018
01/30/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate addition of internal materials to review for eventual production. Continue preparing production volumes from opposing counsel for review.	1/2018
01/31/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production documents for attorney review, including preparing request numbers and descriptions for same.	1/2018
02/01/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production of internal materials and coordinate delivery of same to expert reviewer.	2/2018
02/02/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production version of internal materials for delivery to expert. Continue preparing opposing counsel production volumes for review.	2/2018
02/05/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	2/2018
02/06/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	2/2018
02/07/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	2/2018
02/08/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	2/2018
02/09/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate addition of internal materials to review database in preparation for production. Prepare new opposing counsel production for review.	2/2018
02/12/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate preparation of new materials for eventual production and expert review. Continue preparing production volumes from opposing counsel for review.	2/2018
02/13/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	2/2018
02/14/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, continue preparing production volumes from opposing counsel for review.	2/2018
02/15/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel production for review. Prepare production volumes of selected materials in agreed upon format for expert review and potential production to opposing counsel.	2/2018
02/16/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel production for review. Prepare production volume deliveries for sending to experts for review and coordinate delivery of same.	2/2018
02/20/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel productions for review.	2/2018
02/22/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel productions for review.	2/2018
02/23/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel productions for review.	2/2018
02/26/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	1.50	487.50	325.00	1.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare new opposing counsel production for review. Consult with legal team on document review.	2/2018
02/27/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Export document information for legal team review.	2/2018
02/28/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate preparation on internal materials for future production. Continue preparing counsel productions for review.	2/2018
03/01/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare documents for production in agreed upon format. Prepare new opposing counsel productions for review.	3/2018
03/05/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare new opposing counsel productions for review.	3/2018
03/06/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate preparation of internal materials for review in preparation for production. Prepare opposing counsel production volume for review.	3/2018
03/07/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled		3/2018

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
03/08/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare opposing counsel production volume for review.	3/2018
03/09/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare and send production volumes to expert for review. Consult with legal team on document review.	3/2018
03/12/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate preparation of new materials for attorney review. Consult with legal team on document review.	3/2018
03/13/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Consult with legal team on document review.	3/2018
03/14/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare third party production for attorney review.	3/2018
03/15/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare document exports for attorney review. Coordinate imaging of documents in preparation for production. Prepare document searches for legal team use.	3/2018
03/16/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare third party production for attorney review.	3/2018
03/19/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, gather and organize internal materials to facilitate legal assistant review prior to possible production. Prepare opposing counsel production volumes for review.	3/2018
03/22/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare document production in agreed upon format. Prepare same for delivery to opposing counsel.	3/2018
03/26/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare document export. Prepare opposing counsel review.	3/2018
03/27/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare third party production for attorney review. Prepare opposing counsel production volumes for review.	3/2018
03/28/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare internal materials for production in agreed upon format.	3/2018
03/29/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare third party production for attorney review. Prepare opposing counsel production volumes for review.	3/2018
03/30/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	5.50	1,787.50	325.00	5.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare third party production for attorney review. Prepare opposing counsel production volumes for review.	3/2018
04/02/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare opposing counsel production for review.	4/2018
04/03/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare opposing counsel production for review.	4/2018
04/04/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018
04/05/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018
04/06/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018
04/09/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate scanning of paper materials for attorney review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018
04/10/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018
04/11/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018
04/12/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.00	650.00	325.00	2.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, prepare production of internal materials in agreed upon format. Consult with legal team on document review.	4/2018
04/13/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.00	650.00	325.00	2.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for legal assistant review. Prepare opposing counsel production for review.	4/2018

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
04/16/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate sending of materials for review to experts. Consult with legal team on document review. Prepare opposing counsel production for review.	4/2018
04/17/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.25	1,381.25	325.00	4.25	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, coordinate sending of materials for review to experts. Consult with legal team on document review. Prepare opposing counsel production for review.	4/2018
04/18/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018
04/19/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018
04/20/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018
04/23/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Coordinate preparation of new data for review. Prepare opposing counsel production for review.	4/2018
04/24/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Coordinate preparation of new data for review. Prepare opposing counsel production for review.	4/2018
04/25/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	4/2018
04/26/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Coordinate preparation of new internal paper materials for review. Prepare opposing counsel production for review.	4/2018
04/27/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for sending to experts for review. Prepare opposing counsel production for review.	4/2018
04/30/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Prepare opposing counsel production for review. Code opposing counsel document titles and subjects to aid legal team in review.	4/2018
05/01/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/02/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/03/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/04/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for sending to experts for review. Prepare opposing counsel production for review.	5/2018
05/07/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/08/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/09/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/10/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/11/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Ms. Williams, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
05/14/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/15/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/16/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/17/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/18/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/21/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/22/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/23/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	1.00	325.00	325.00	1.00	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/24/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/25/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/29/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/30/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
05/31/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	5/2018
06/01/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/04/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/05/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.00	1,300.00	325.00	4.00	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/06/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	5.00	1,625.00	325.00	5.00	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/07/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	4.50	1,462.50	325.00	4.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/08/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.00	975.00	325.00	3.00	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018

Date	SWTask	Attorney	Name	Staff Level	Description	Rate	Org Hrs	Org Amt	Org Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
06/11/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/12/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	3.50	1,137.50	325.00	3.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/13/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/14/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.00	650.00	325.00	2.00	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
06/15/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	2.50	812.50	325.00	2.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	6/2018
08/08/2018		5693	Michel, Paul	20710	eDiscovery Specialist	0	1.50	487.50	325.00	1.50	0.00	0.00	08000		0	Unbilled	Per request of Mr. Howard, consult with legal team on document review. Organize internal materials for production. Prepare opposing counsel production for review.	8/2018
01/15/2019		8258	Swendsboe, Krystal	10110	Associate	0	0.30	166.50	555.00	0.30	0.00	0.00	08000		0	Billed	Confer with Mr. Howard re research issue.	1/2019
01/15/2019		8258	Swendsboe, Krystal	10110	Associate	0	0.30	166.50	555.00	0.30	0.00	0.00	08000		0	Unbilled	Confer with Mr. Howard re research issue.	2/2019
01/15/2019		8258	Swendsboe, Krystal	10110	Associate	0	-0.30	-166.50	555.00	-0.30	0.00	0.00	08000		0	Billed	Confer with Mr. Howard re research issue.	2/2019
01/19/2019		8258	Swendsboe, Krystal	10110	Associate	0	2.00	1,110.00	555.00	2.00	0.00	0.00	08000		0	Billed	Research state law question, draft summary of research.	1/2019
01/19/2019		8258	Swendsboe, Krystal	10110	Associate	0	2.00	1,260.00	630.00	2.00	0.00	0.00	08000		0	Unbilled	Research state law question, draft summary of research.	2/2019
01/19/2019		8258	Swendsboe, Krystal	10110	Associate	0	-2.00	-1,110.00	555.00	-2.00	0.00	0.00	08000		0	Billed	Research injunctive issue, draft summary re same, confer with Mr. Howard.	2/2019
01/23/2019		8258	Swendsboe, Krystal	10110	Associate	0	2.00	1,260.00	630.00	2.00	0.00	0.00	08000		0	Unbilled	Research injunctive issue, draft summary re same, confer with Mr. Howard.	1/2019
06/12/2017		9406	Williams, Rachel	20410	Project Assistant	0	4.30	2,709.00	205.00	4.30	0.00	0.00	08000		0	Unbilled	Worked with IS department to gain access to extranet.	6/2017
06/13/2017		9406	Williams, Rachel	20410	Project Assistant	0	6.50	1,332.50	205.00	6.50	0.00	0.00	08000		0	Unbilled	Conference with Mr. Howard and Ms. Lynn regarding needs in the case. Reviewed opinion and settlement agreement for case background, coordinated access to extranet and necessary document files and began initial review of files.	6/2017
06/20/2017		9406	Williams, Rachel	20410	Project Assistant	0	4.50	922.50	205.00	4.50	0.00	0.00	08000		0	Unbilled	Continued review of declarations and medical records.	6/2017
06/22/2017		9406	Williams, Rachel	20410	Project Assistant	0	7.50	1,537.50	205.00	7.50	0.00	0.00	08000		0	Unbilled	Continued review of inmate medical records for discrepancies.	6/2017
06/23/2017		9406	Williams, Rachel	20410	Project Assistant	0	6.00	1,230.00	205.00	6.00	0.00	0.00	08000		0	Unbilled	Continued to review medical files and claimant declarations.	6/2017
06/25/2017		9406	Williams, Rachel	20410	Project Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000		0	Unbilled	Continued review of declarations and medical files.	6/2017
06/28/2017		9406	Williams, Rachel	20210	Legal Assistant	0	4.50	922.50	205.00	4.50	0.00	0.00	08000		0	Unbilled	Completed initial review of medical files of inmates.	7/2017
06/27/2017		9406	Williams, Rachel	20210	Legal Assistant	0	3.00	615.00	205.00	3.00	0.00	0.00	08000		0	Unbilled	Conference with Mr. Howard and Miss Flynn regarding document review findings and began follow up research.	7/2017
06/28/2017		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000		0	Unbilled	Completed updated review of prison records.	7/2017
06/30/2017		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000		0	Unbilled	Review newly updated records and responses from co-counsel regarding earlier raised concerns.	7/2017
11/27/2017		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000		0	Unbilled	Phone Conference regarding discovery staffing needs for matter, conference with practice support regarding migration to relativity database.	11/2017
12/18/2017		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000		0	Unbilled	Conference with Legal support regarding attorney general response to document production protocol. Coordination with Mr. T. Howard to plan next steps in for response to attorney general's request for production accommodations.	12/2017
12/19/2017		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000		0	Unbilled	Coordination with Team regarding upcoming call with opposing counsel regarding production specification requirements and requests.	12/2017
12/20/2017		9406	Williams, Rachel	20210	Legal Assistant	0	1.50	307.50	205.00	1.50	0.00	0.00	08000		0	Unbilled	Conference with Mr. Howard, Co-counsel and office of the Attorney General of Virginia regarding compromises for the document production protocol and follow up with Mr. Michel to determine possible needs in light of conversation.	12/2017
12/22/2017		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000		0	Unbilled	Review of OAG IT department revisions of production specifications.	12/2017
12/27/2017		9406	Williams, Rachel	20210	Legal Assistant	0	4.50	922.50	205.00	4.50	0.00	0.00	08000		0	Unbilled	Conference with team regarding OAG office's alteration of production specification agreement and research regarding potential impacts of requested changes.	12/2017
12/29/2017		9406	Williams, Rachel	20210	Legal Assistant	0	5.00	1,025.00	205.00	5.00	0.00	0.00	08000		0	Unbilled	Emails regarding questions for opposing counsel and potential areas of compromise for rolling production request. Make edits to production protocol regarding needs and clarifying statements by opposing counsel and discussion of potential impact should they fail to agree to our proposed requirements.	12/2017

Time Report
Billed and Unbilled
Washington Lawyers Committee for Civil / Fuvama Medical Care Class Action (75459-21)

Date	SMTask	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate	Service	Activity	Invoice	Status	Narrative	Posted
01/09/2018		9406	Williams, Rachel	20210	Legal Assistant	0	1.50	307.50	205.00	1.50	0.00	0.00	08000	0		Unbilled	Emails regarding recent receipt of production documents and organizational structure for internal on-boarding of received data.	1/2018
01/19/2018		9406	Williams, Rachel	20210	Legal Assistant	0	3.00	615.00	205.00	3.00	0.00	0.00	08000	0		Unbilled	Coordination of upcoming conference and review of recently received documents.	1/2018
01/17/2018		9406	Williams, Rachel	20210	Legal Assistant	0	1.00	205.00	205.00	1.00	0.00	0.00	08000	0		Unbilled	Review of case documents.	1/2018
01/19/2018		9406	Williams, Rachel	20210	Legal Assistant	0	1.50	307.50	205.00	1.50	0.00	0.00	08000	0		Unbilled	Conference regarding relativity training.	1/2018
01/29/2018		9406	Williams, Rachel	20210	Legal Assistant	0	4.50	922.50	205.00	4.50	0.00	0.00	08000	0		Unbilled	Preparation of materials for subpoena duces tecum.	1/2018
01/31/2018		9406	Williams, Rachel	20210	Legal Assistant	0	3.00	615.00	205.00	3.00	0.00	0.00	08000	0		Unbilled	Correction of prior document preparation; review of newly added documents to relativity database.	1/2018
02/06/2018		9406	Williams, Rachel	20210	Legal Assistant	0	3.00	615.00	205.00	3.00	0.00	0.00	08000	0		Unbilled	Conference with H. Lynn regarding production catalog needs and assistance and completion of task.	2/2018
02/21/2018		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000	0		Unbilled	Review of database documents.	2/2018
02/22/2018		9406	Williams, Rachel	20210	Legal Assistant	0	2.00	410.00	205.00	2.00	0.00	0.00	08000	0		Unbilled	Document review of new data upload and other relativity materials.	2/2018
02/26/2018		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000	0		Unbilled	Began preparation of materials for second subpoena set and coordination of service.	2/2018
02/27/2018		9406	Williams, Rachel	20210	Legal Assistant	0	4.00	820.00	205.00	4.00	0.00	0.00	08000	0		Unbilled	Preparation of materials for second subpoena set and coordination of service.	2/2018
03/06/2018		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000	0		Unbilled	Compiled information regarding opposing counsel responses to document requests.	3/2018
03/19/2018		9406	Williams, Rachel	20210	Legal Assistant	0	2.00	410.00	205.00	2.00	0.00	0.00	08000	0		Unbilled	Conference with P. Michel and T. Howard regarding matter; review of database and new documents relevant to production.	3/2018
03/20/2018		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000	0		Unbilled	Coordinated re-send of production documents; set up of physical hard drive and mailing of hard drives to recipients.	3/2018
03/26/2018		9406	Williams, Rachel	20210	Legal Assistant	0	3.50	717.50	205.00	3.50	0.00	0.00	08000	0		Unbilled	Conference with H. Lynn regarding new document production and begin working on project request.	3/2018
04/17/2018		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000	0		Unbilled	Review of new documents recently received.	4/2018
04/24/2018		9406	Williams, Rachel	20210	Legal Assistant	0	2.50	512.50	205.00	2.50	0.00	0.00	08000	0		Unbilled	Meeting with counsel.	4/2018
04/27/2018		9406	Williams, Rachel	20210	Legal Assistant	0	5.00	1,025.00	205.00	5.00	0.00	0.00	08000	0		Unbilled	Document titling for production.	4/2018
04/30/2018		9406	Williams, Rachel	20210	Legal Assistant	0	7.50	1,537.50	205.00	7.50	0.00	0.00	08000	0		Unbilled	Document titling for production.	4/2018
			Williams, Rachel	Total			118.00	24,190.00		118.00	0.00	0.00						
			Grand Total				2,115.95	1,182,624.25		2,115.95	0.00	0.00						

EXHIBIT 2

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., McDowell v. District of Columbia, Civ. A. No. 00-5641 (R.E.S.), LEXIS 20010233, Dist. L.B. 825, 8114 (D.D.C. June 14, 2000); Salazar v. Dist. of Col., 123 F.Supp.2d 8 (D.D.C. 2000).							

* "Years Out of Law School" is calculated from June 1 of each year, when most law students graduate. "1-3" includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). "4-7" applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier "1-3" from June 1, 1996 until May 31, 1999, would move into tier "4-7" on June 1, 1999, and tier "8-10" on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT 3

USAO ATTORNEY'S FEES MATRIX — 2015-2019

Revised Methodology starting with 2015-2016 Year

Years (Hourly Rate for June 1 – May 31, based on change in PPI-OL since January 2011)

Experience	2015-16	2016-17	2017-18	2018-19
31+ years	568	581	602	613
21-30 years	530	543	563	572
16-20 years	504	516	536	544
11-15 years	455	465	483	491
8-10 years	386	395	410	417
6-7 years	332	339	352	358
4-5 years	325	332	346	351
2-3 years	315	322	334	340
Less than 2 years	284	291	302	307
Paralegals & Law Clerks	154	157	164	166

Explanatory Notes

1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared by the Civil Division of the United States Attorney's Office for the District of Columbia (USAO) to evaluate requests for attorney's fees in civil cases in District of Columbia courts. The matrix is intended for use in cases in which a fee-shifting statute permits the prevailing party to recover "reasonable" attorney's fees. *See, e.g.*, 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412(b) (Equal Access to Justice Act). The matrix has not been adopted by the Department of Justice generally for use outside the District of Columbia, or by other Department of Justice components, or in other kinds of cases. The matrix does **not** apply to cases in which the hourly rate is limited by statute. *See* 28 U.S.C. § 2412(d).
2. A "reasonable fee" is a fee that is sufficient to attract an adequate supply of capable counsel for meritorious cases. *See, e.g., Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010). Consistent with that definition, the hourly rates in the above matrix were calculated from average hourly rates reported in 2011 survey data for the D.C. metropolitan area, which rates were adjusted for inflation with the Producer Price Index-Office of Lawyers (PPI-OL) index. The survey data comes from ALM Legal Intelligence's 2010 & 2011 Survey of Law Firm Economics. The PPI-OL index is available at <http://www.bls.gov/ppi>. On that page, under "PPI Databases," and "Industry Data (Producer Price Index - PPI)," select either "one screen" or "multi-screen" and in the resulting window use "industry code" 541110 for "Offices of Lawyers" and "product code" 541110541110 for "Offices of Lawyers." The average hourly rates from the 2011 survey data are multiplied by the PPI-OL index for May in the year of the update, divided by 176.6, which is the PPI-OL index for January 2011, the month of the survey data, and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
3. The PPI-OL index has been adopted as the inflator for hourly rates because it better reflects the mix of legal services that law firms collectively offer, as opposed to the legal services that typical consumers use, which is what the CPI-

Legal Services index measures. Although it is a national index, and not a local one, *cf. Eley v. District of Columbia*, 793 F.3d 97, 102 (D.C. Cir. 2015) (noting criticism of national inflation index), the PPI-OL index has historically been generous relative to other possibly applicable inflation indexes, and so its use should minimize disputes about whether the inflator is sufficient.

4. The methodology used to compute the rates in this matrix replaces that used prior to 2015, which started with the matrix of hourly rates developed in *Laffey v. Northwest Airlines, Inc.* 572 F. Supp. 354 (D.D.C. 1983), *aff'd in part, rev'd in part on other grounds*, 746 F.2d 4 (D.C. Cir. 1984), *cert. denied*, 472 U.S. 1021 (1985), and then adjusted those rates based on the Consumer Price Index for All Urban Consumers (CPI-U) for the Washington-Baltimore (DC-MD-VA-WV) area. Because the USAO rates for the years 2014-15 and earlier have been generally accepted as reasonable by courts in the District of Columbia, *see* note 9 below, the USAO rates for those years will remain the same as previously published on the USAO's public website. That is, the USAO rates for years prior to and including 2014-15 remain based on the prior methodology, *i.e.*, the original *Laffey* Matrix updated by the CPI-U for the Washington-Baltimore area. *See Citizens for Responsibility & Ethics in Washington v. Dep't of Justice*, 142 F. Supp. 3d 1 (D.D.C. 2015) and Declaration of Dr. Laura A. Malowane filed therein on Sept. 22, 2015 (Civ. Action No. 12-1491, ECF No. 46-1) (confirming that the USAO rates for 2014-15 computed using prior methodology are reasonable).
5. Although the USAO will not issue recalculated *Laffey* Matrices for past years using the new methodology, it will not oppose the use of that methodology (if properly applied) to calculate reasonable attorney's fees under applicable fee-shifting statutes for periods prior to June 2015, provided that methodology is used consistently to calculate the entire fee amount. Similarly, although the USAO will no longer issue an updated *Laffey* Matrix computed using the prior methodology, it will not oppose the use of the prior methodology (if properly applied) to calculate reasonable attorney's fees under applicable fee-shifting statutes for periods after May 2015, provided that methodology is used consistently to calculate the entire fee amount.
6. The various "brackets" in the column headed "Experience" refer to the attorney's years of experience practicing law. Normally, an attorney's experience will be calculated starting from the attorney's graduation from law school. Thus, the "Less than 2 years" bracket is generally applicable to attorneys in their first and second years after graduation from law school, and the "2-3 years" bracket generally becomes applicable on the second anniversary of the attorney's graduation (*i.e.*, at the beginning of the third year following law school). *See Laffey*, 572 F. Supp. at 371. An adjustment may be necessary, however, if the attorney's admission to the bar was significantly delayed or the attorney did not otherwise follow a typical career progression. *See, e.g., EPIC v. Dep't of Homeland Sec.*, 999 F. Supp. 2d 61, 70-71 (D.D.C. 2013) (attorney not admitted to bar compensated at "Paralegals & Law Clerks" rate); *EPIC v. Dep't of Homeland Sec.*, 982 F. Supp. 2d 56, 60-61 (D.D.C. 2013) (same). The various experience levels were selected by relying on the levels in the ALM Legal Intelligence 2011 survey data. Although finer gradations in experience level might yield different estimates of market rates, it is important to have statistically sufficient sample sizes for each experience level. The experience categories in the current USAO Matrix are based on statistically significant sample sizes for each experience level.
7. ALM Legal Intelligence's 2011 survey data does not include rates for paralegals and law clerks. Unless and until reliable survey data about actual paralegal/law clerk rates in the D.C. metropolitan area become available, the USAO will compute the hourly rate for Paralegals & Law Clerks using the most recent historical rate from the USAO's former *Laffey* Matrix (*i.e.*, \$150 for 2014-15) updated with the PPI-OL index. The formula is \$150 multiplied by the PPI-OL index for May in the year of the update, divided by 194.3 (the PPI-OL index for May 2014), and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
8. The USAO anticipates periodically revising the above matrix if more recent reliable survey data becomes available, especially data specific to the D.C. market, and in the interim years updating the most recent survey data with the PPI-OL index, or a comparable index for the District of Columbia if such a locality-specific index becomes available.
9. Use of an updated *Laffey* Matrix was implicitly endorsed by the Court of Appeals in *Save Our Cumberland Mountains v. Hodel*, 857 F.2d 1516, 1525 (D.C. Cir. 1988) (en banc). The Court of Appeals subsequently stated that parties may rely on the updated *Laffey* Matrix prepared by the USAO as evidence of prevailing market rates for litigation counsel in the Washington, D.C. area. *See Covington v. District of Columbia*, 57 F.3d 1101, 1105 & n.14, 1109 (D.C. Cir. 1995), *cert. denied*, 516 U.S. 1115 (1996). Most lower federal courts in the District of Columbia

have relied on the USAO's *Laffey* Matrix, rather than the so-called "*Salazar* Matrix" (also known as the "LSI Matrix" or the "Enhanced *Laffey* Matrix"), as the "benchmark for reasonable fees" in this jurisdiction. *Miller v. Holzmänn*, 575 F. Supp. 2d 2, 18 n.29 (D.D.C. 2008) (quoting *Pleasants v. Ridge*, 424 F. Supp. 2d 67, 71 n.2 (D.D.C. 2006)); see, e.g., *Joaquin v. Friendship Pub. Charter Sch.*, 188 F. Supp. 3d 1 (D.D.C. 2016); *Prunty v. Vivendi*, 195 F. Supp. 3d 107 (D.D.C. 2016); *CREW v. U.S. Dep't of Justice*, 142 F. Supp. 3d 1 (D.D.C. 2015); *McAllister v. District of Columbia*, 21 F. Supp. 3d 94 (D.D.C. 2014); *Embassy of Fed. Republic of Nigeria v. Ugwuonye*, 297 F.R.D. 4, 15 (D.D.C. 2013); *Berke v. Bureau of Prisons*, 942 F. Supp. 2d 71, 77 (D.D.C. 2013); *Fisher v. Friendship Pub. Charter Sch.*, 880 F. Supp. 2d 149, 154-55 (D.D.C. 2012); *Sykes v. District of Columbia*, 870 F. Supp. 2d 86, 93-96 (D.D.C. 2012); *Heller v. District of Columbia*, 832 F. Supp. 2d 32, 40-49 (D.D.C. 2011); *Hayes v. D.C. Public Schools*, 815 F. Supp. 2d 134, 142-43 (D.D.C. 2011); *Queen Anne's Conservation Ass'n v. Dep't of State*, 800 F. Supp. 2d 195, 200-01 (D.D.C. 2011); *Woodland v. Viacom, Inc.*, 255 F.R.D. 278, 279-80 (D.D.C. 2008); *American Lands Alliance v. Norton*, 525 F. Supp. 2d 135, 148-50 (D.D.C. 2007). But see, e.g., *Salazar v. District of Columbia*, 123 F. Supp. 2d 8, 13-15 (D.D.C. 2000). Since initial publication of the instant USAO Matrix in 2015, numerous courts similarly have employed the USAO Matrix rather than the *Salazar* Matrix for fees incurred since 2015. E.g., *Electronic Privacy Information Center v. United States Drug Enforcement Agency*, 266 F. Supp. 3d 162, 171 (D.D.C. 2017) ("After examining the case law and the supporting evidence offered by both parties, the Court is persuaded that the updated USAO matrix, which covers billing rates from 2015 to 2017, is the most suitable choice here.") (requiring recalculation of fees that applicant had computed according to *Salazar* Matrix); *Clemente v. FBI*, No. 08-1252 (BJR) (D.D.C. Mar. 24, 2017), 2017 WL 3669617, at *5 (applying USAO Matrix, as it is "based on much more current data than the *Salazar* Matrix"); *Gatore v. United States Dep't of Homeland Security*, 286 F. Supp. 3d 25, 37 (D.D.C. 2017) (although plaintiff had submitted a "'great deal of evidence regarding [the] prevailing market rates for complex federal litigation' to demonstrate that its requested [*Salazar*] rates are entitled to a presumption of reasonableness, . . . the Court nonetheless concludes that the defendant has rebutted that presumption and shown that the current USAO Matrix is the more accurate matrix for estimating the prevailing rates for complex federal litigation in this District"); *DL v. District of Columbia*, 267 F. Supp. 3d 55, 70 (D.D.C. 2017) ("the USAO Matrix ha[s] more indicia of reliability and more accurately represents prevailing market rates" than the *Salazar* Matrix). The USAO contends that the *Salazar* Matrix is fundamentally flawed, does not use the *Salazar* Matrix to determine whether fee awards under fee-shifting statutes are reasonable, and will not consent to pay hourly rates calculated with the methodology on which that matrix is based. The United States recently submitted an appellate brief that further explains the reliability of the USAO Matrix vis-à-vis the *Salazar* matrix. See Br. for the United States as *Amicus Curiae* Supporting Appellees, *DL v. District of Columbia*, No. 18-7004 (D.C. Cir. filed July 20, 2018).